From: Ian LEWIS (7336)
To: Asbcomment Letters;
Subject: Response to "The Financial Reporting of Pensions: ASB issues Discussion Paper on future directions"
Date: 14 July 2008 10:57:42

We would endorse the response provided by the British Universities Finance Directors Group to the consultation documents.

In addition we would emphasise that unless we have a common basis of disclosure for all pension schemes - single or multi employer; funded or unfunded - we lose comparability in reporting between entities. As comparability is a major basis for accounting standards FRS17 in present form is flawed.

The Pro-active Accounting Activities in Europe (PAAinE) Discussion Paper 'The Financial Reporting of Pensions' also challenges the basis to calculate liabilities, in that it suggest this should be based on the future costs in respect of current services only - as this is the liability at the balance sheet date - and not to include future service. We have some sympathy for this view, as the present method within FRS 17 tends to overstate liabilities.

Your sincerely

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