

Оренда – громадське обговорення нового єдиного стандарту

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Оренда була визначена як сфера бухгалтерського обліку, що підлягає удосконаленню. Облік оренди є спільним проектом згідно Меморандуму про розуміння між IASB та FASB. Оренда стоїть на порядку денному розвитку нових єдиних стандартів рад директорів. Важливою частиною розробки нового єдиного стандарту є громадське обговорення. Опублікувавши спільні матеріали для обговорення оренди: попередні розгляди (Preliminary Views) та пропонування проекту оренди (exposure draft Leases). В обох випадках було ініційовано громадське обговорення про облік оренди. Показники реакції, особливо щодо пропонованого проекту оренди, були досить високими. Це може пояснюватись тим, що проект оренди є спільним проектом IFRS – US GAAP або через велику кількість об'єктів діяльності, залучених до таких операцій. У громадському обговоренні взяли участь багато респондентів з різних географічних регіонів та різних галузей промисловості.

Громадське обговорення пропозицій рад директорів, викладених в матеріалах на обговорення та запропонованому проекті, також супроводжувала просвітницька діяльність (круглі столи, польові дослідження, інтернет-трансляції, подкасти), яка отримала найвищу можливу реакцію від різних зацікавлених осіб. Початковий намір рад директорів - видання нових стандартів в другому кварталі 2011 року - був змінений для того, щоб повторно піддати перегляду пропозиції розробки універсальних стандартів оренди та стимулювати подальше громадське обговорення з метою встановлення високоякісних, єдиних, глобальних стандартів обліку.

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Leases – Public Discussion of a New Common Standard

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The paper focus on the importance of public discussion for developing a new common standard in case of topical lease accounting. To stimulate the public discussion the IASB and the FASB have done several outreach activities and going to continue in obtaining more views from stakeholders.

Keywords – leases, comment letter, outreach activities, IASB, FASB, IFRS.

I. Introduction

Lease accounting was discovered by IASB and FASB as an area which should be improved already in 2006. The pressure to improve standards came also from Leaders of G20 in 2009. After that start a whole process of developing a new common standard became more desirable. Developing of high quality standard through independent standard-setting process, called due process, brought a wide public discussion of lease accounting.

Lease accounting is one of the Joint Project of the IASB and the FASB. The project has been taken under the Memorandum of Understanding (Norwalk Agreement, September 2002 in Norwalk).

II. Public Discussion of a New Common Standard

On 19th March 2009 the IASB and the FASB published a joint discussion paper Leases: Preliminary Views. In discussion paper the boards introduce and explain the issues concerning to lease accounting and discuss a possible new approach to leases.

By the publishing the discussion paper the boards launched a public discussion on lease accounting. Next to the objective to explain the issues of lease accounting, the second objective of discussion paper is to solicit comments from different respondents on the boards' proposals. Every boards' discussed issue, proposal in discussion paper is accompanied by the specific questions for respondents. The discussion paper was open for comments for four months.

The boards received overall 318 letters, when 231 letters were received during the comment period and the remaining letters were received outside the comment period.

Statistical data relating to the 290 comment letters by the type and geographic region of respondents received until 11th August 2009 are summarized in graphs below.

On 17th August 2010 the IASB and the FASB published a joint exposure draft Leases. The exposure draft represents the document of boards' proposals to improve the reporting of lease contracts. These proposals were developed on the basis of discussion paper and especially taking into account feedback received.

By the publishing the exposure draft the boards launched another public comment period. The inceptive part "Introduction and Invitation to Comment" of exposure draft comprises questions for respondents. The boards invite

individuals and organizations to comment on all matters in the exposure draft, but particularly on the listed questions in this introduction and invitation part. The exposure draft was also open for comments for four months.

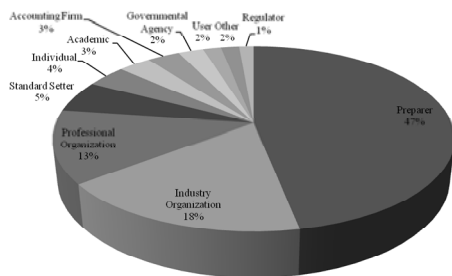


Fig. 1. Comment Letter Summary of DP by Type of Respondent

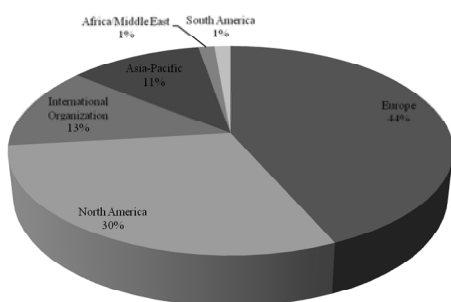


Fig. 2. Comment Letter Summary of DP by Geographic Region

The boards received overall 782 comment letters during and some of them after the four months comment period.

The boards stated that the response rate to exposure draft Leases was very high and suppose that it is because of many entities are involved in lease transactions. Consequently, they suppose that it is not surprising that a diverse range of industries are well represented in the responses, including retail, financial services, real estate, transportation, power and utilities, tourism and hospitality. Some of the concerns raised by those respondents were specific to their industry, but many concerns expressed were shared by respondents from a range of different industries. The high response rate was from preparers as well as from the substantial number of responses from auditors, accounting professional bodies, national standard-setters, industry organisations and other interested parties including academics.

The boards suppose that the very high response rate can be also attributed to the lease project being an IFRS-US GAAP convergence project, which ensured the comment letters from a geographically diverse range of respondents. An interesting fact is that next to the responses received from the FASB's and the IASB's constituents from jurisdictions using IFRS since 2005, such as Europe and Australia, the responses were received also from jurisdictions adopting IFRSs for the first time in 2010 or 2011 (Brazil, Canada and South Korea) or planning the adoption of IFRSs from 2012, such as India, and from jurisdictions that are in the process of making a decision on whether to adopt IFRSs in the future, such as Japan.

Statistical data relating to the 760 comment letters by type and geographic region of the respondents received as of 12th January 2011 are summarized in graphs below.

Before, during and after the comment period of the exposure draft both of the IASB and the FASB were performing several outreach activities. They were doing field work, they were having webcasts, podcasts etc.

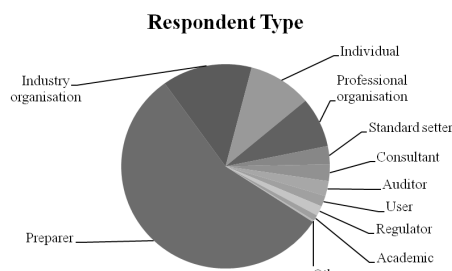


Fig. 3. Comment Letter Summary of ED by Respondent Type

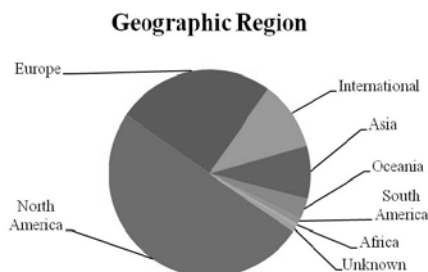


Fig. 4. Comment Letter Summary of ED by Geographic Region

The boards held fifteen preparer workshops in London, Tokyo, Seoul, Melbourne, São Paulo, Toronto and Norwalk during November and December 2010. These workshops were attended by representatives from over 90 organisations.

One of the important role of outreach activities were the Round tables. The boards were seeking participation in round tables from a wide variety of stakeholders, including users, preparers, auditors and others. The boards held 7 roundtables in London, Hong Kong, Chicago and Norwalk during December 2010 and January 2011. These round tables were attended by representatives from over 80 interested parties and included one round table focused on private and not for profit entities.

The high response rate, which have stimulated wide public discussion in case of lease accounting, resulted in the boards' intention to re-expose their revised proposals for a common leasing standard. This fact was announced by both of the boards on 21st July 2011, even though the original intention was to issue a new common standard at the end of second quarter of 2011. The boards decided to continue in further public discussion of lease accounting and to obtain more views from stakeholders.

Conclusion

By carrying all the activities described in the paper, the boards managed to stimulate a wide public discussion of lease accounting. All the feedback received and discussed problems can help the boards to archive the goal to set a high quality, global accounting standards.

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