

The Institute of Chartered Accountants of Pakistan

HEAD OFFICE

Technical Director
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International Federation of Accountants
277 Wellington Street West, 6th Floor
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CANADA

June 15, 2011

Subject: **COMMENTS ON CONSULTATION PAPER 'CONCEPTUAL FRAMEWORK FOR GENERAL PURPOSE FINANCIAL REPORTING BY PUBLIC SECTOR ENTITIES'**

Dear Sir,

The Institute of Chartered Accountants of Pakistan welcomes the opportunity to offer comments on the above mentioned Consultation Paper.

Please find enclosed the comments of the relevant Committee of the Institute for your perusal.

If you require any further clarification, please do not hesitate to contact us.

Yours faithfully,

Haroon Tabraze
Director Technical Services
The Institute of Chartered Accountants of Pakistan
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COMMENTS ON CONCEPTUAL FRAMEWORK FOR GENERAL PURPOSE FINANCIAL REPORTING BY PUBLIC SECTOR ENTITIES: MEASUREMENT OF ASSETS AND LIABILITIES IN FINANCIAL STATEMENTS

Specific Matter for Comment 1

Should the role of the Framework be to identify factors that are relevant in selecting a measurement basis for particular assets and liabilities in specific circumstances, rather than specify a single measurement basis or combination of bases?

Comments

Role of the Framework should be to identify factors that are relevant in selecting a measurement basis for particular assets and liabilities in specific circumstances rather than specify a single measurement basis or combination of bases.

Specific Matter for Comment 2

If, in your view the Framework should specify a measurement basis or combination of bases (or approach in the case of deprival value), which should that be?

Single Measurement Bases
- **(a) Historical cost.**
- **(b) Market value.**
- **(c) Replacement cost.**

Combinations of Bases/Approach
- **(d) Deprival value.**
- **(e) Historical cost and market value.**
- **(f) Replacement cost and market value.**
- **(g) Historical cost, replacement cost, and market value.**

Others
- **(h) Another measurement basis or combination of bases/approach.**

Please explain why you support a particular measurement basis or combination of measurement bases/approach and your reasons for rejecting alternatives.

Comments

The Deprival Value approach gives the best measurement basis since it precisely makes the measurement basis according to the objects of GPFRs and needs of primary users.

Specific Matter for Comment 3

The Consultation Paper discusses the following measurement bases: historical cost, market value, and replacement cost. It also discusses the deprival value concept which does not describe a single measurement basis, but rather a means by which a basis may be selected that is relevant to the circumstances. Value in use and net selling price are discussed in the context of the deprival value model.

In your view, is this discussion complete, balanced and fair? If not, please indicate what in your view is missing or in what respects you consider the discussion does not draw out the strengths and weaknesses of the various bases (or approach in the case of deprival value).

Comments

In our opinion the discussion is complete balances and fair.

Specific Matter for Comment 4

In your view, should:

(a) The effect of an entity's own credit risk be reflected in the measurement of liabilities at initial recognition; and

Comments

In our opinion the effect of an entity's on credit risk should not be reflected at initial measurement.

(b) The effect of changes in own credit risk be reflected when liabilities are subsequently remeasured?

Comments

In our opinion the effect of entity's own credit risk should be reflected on subsequent remeasurement.

Specific Matter for Comment 5

In your view, where assets are not restricted in use and therefore may be sold for an alternative use, should the measurement reported in the statement of financial position reflect:

(a) Only the service potential relating to the existing use; or

(b) Include the incremental value relating to its possible sale for an alternative use?

Comments

In our opinion, for the better understanding of users of GPFRs, it is more appropriate to include the incremental value relating to possible sale for an alternative use.

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June 10, 2011

Ms. Stephenie Fox
Technical Director
International Public Sector Accounting
Standards Board
International Federation of Accountants
277 Wellington Street West, 6th Floor
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CANADA

Dear Ms Fox

Phase III of the Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: Measurement of Assets and Liabilities in Financial Statements

As stated in our letter dated June 10, 2011 on the Exposure Draft of phase I of the IPSASB's Conceptual Framework project, the IDW recognizes that there is a distinct need for a conceptual framework for general purpose financial reporting by the public sector. We continue to believe that, as stated in our letter to you dated 31 March 2009, the discussion is of fundamental importance for the future development of International Public Sector Accounting Standards.

In the aforementioned letter, to which we refer, we also stated our support for the IPSASB in now concentrating significant resources on bringing this important project forward, but expressed our concern as to whether the IPSASB's timetable may be overly optimistic, as it would essentially mean that the IPSASB would complete the project independently – and thus likely ahead – of the IASB's Conceptual Framework Project.

Indeed, in respect of this phase of the project we also accept that differences between the public and private sector will need to be addressed, but nevertheless believe that at a conceptual level there are likely to be significant areas of common ground between the two sectors, and therefore also urge the Board to confer with the IASB on the issues dealt with in this phase of the project prior to finalizing the project as a whole.

GESCHÄFTSFÜHRENDER VORSTAND:
Prof. Dr. Klaus-Peter Naumann,
WP StB, Sprecher des Vorstands;
Dr. Klaus-Peter Feld, WP StB CPA;
Manfred Hamannt, RA

For example, whilst there may be public sector specifics that mean the selection of different measurement bases for a particular element would be different from the private sector, the bases that are hitherto available are unlikely to differ. It remains to be seen whether in the future further possibilities will evolve for measurement within either sector compared to the other.

Having said this, we believe the IPSASB has posed the right questions to gain insight in to the views of its constituents. We include our responses to the Specific Matters for Comment in an appendix to this letter.

However, we would also like to question why fair value has not been given more attention as a measurement basis in the discussion in this phase of the project, particularly as the IPSAS dealing with financial instruments require fair value to be used, and we suspect that when such instruments are held for trading there is no real difference whether the entity holding the asset is within the private or the public sector. A discussion of the merits and disadvantages of fair value would seem to be appropriate in this phase of the Framework.

We hope our comments in the Appendix will be useful to the IPSASB in drafting this phase of the Framework. We would be pleased to answer any questions that you may have or discuss any aspect of this letter.

Yours sincerely

Klaus-Peter Naumann
Chief Executive Officer

Gillian Waldbauer
Technical Manager International Affairs

INSTITUT DER WIRTSCHAFTSPRÜFER

Appendix

Specific Matter for Comment 1

Should the role of the Framework be to identify factors that are relevant in selecting a measurement basis for particular assets and liabilities in specific circumstances, rather than specify a single measurement basis or combination of bases?

Yes, the Framework should provide a sound basis to guide standard setters – and in the absence of a standard on a particular issue preparers – in identifying factors that are relevant in selecting a measurement basis for particular assets and liabilities, and also items of income and expenditure, in specific circumstances that can provide the most useful information for decision makers.

Standard setters should thus refer to the Framework when specifying a single measurement basis or combination of bases for particular items in specific circumstances. Similarly, the Framework should also provide a point of reference for preparers faced with circumstances not previously dealt with in financial reporting standards.

Specific Matter for Comment 2

If, in your view the Framework should specify a measurement basis or combination of bases (or approach in the case of deprival value), which should that be?

Single Measurement Bases

a) *Historical cost.*

b) *Market value.*

c) *Replacement cost.*

Combinations of Bases/Approach

d) *Deprival value.*

e) *Historical cost and market value.*

f) *Replacement cost and market value.*

INSTITUT DER WIRTSCHAFTSPRÜFER

g) *Historical cost, replacement cost, and market value.*

Others

h) *Another measurement basis or combination of bases/approach.*

Please explain why you support a particular measurement basis or combination of measurement bases/approach and your reasons for rejecting alternatives.

The Framework should specify each of the various measurement bases that could be relevant in particular contexts, to enable standard setters to make informed decisions when determining whether a particular basis or a combination of bases should be applied to an individual item. The Framework should therefore identify, define and describe each measurement basis, and discuss the extent to which each satisfies the qualitative criteria identified in Phase 1 of the IPSASB's Conceptual Framework Project.

In addition to the bases listed above, value in use and net selling price should also be discussed in their own merit as opposed to within the deprival value concept.

Specific Matter for Comment 3

The Consultation Paper discusses the following measurement bases: historical cost, market value, and replacement cost. It also discusses the deprival value concept which does not describe a single measurement basis, but rather a means by which a basis may be selected that is relevant to the circumstances. Value in use and net selling price are discussed in the context of the deprival value model.

In your view, is this discussion complete, balanced and fair? If not, please indicate what in your view is missing or in what respects you consider the discussion does not draw out the strengths and weaknesses of the various bases (or approach in the case of deprival value).

We are concerned that the deprival value concept is not well known, and is not a measurement basis in its own right; rather it assists in determination of the most appropriate measurement basis in a particular set of circumstances (decision tool).

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In addition, whilst we recognize that paragraph 1.14 of the consultation paper explains why fair value is not included, given its prominence in the discussions surrounding financial reporting by the private sector – in particular for financial instruments, which are also prevalent in the public sector – we do not share the view that no discussion of fair value should be included.

As explained in paragraph 4.10, replacement cost provides input for future decision making, it would be helpful for paragraph 4.8 to also note the need to consider the likely future use – for example if the demographic changes were the result of e.g., a one-off natural catastrophe they would likely not be representative, and thus it would be inappropriate to measure a school at a replacement value based on "temporary" demographic changes.

The Conceptual Framework also needs to address the impact of factors such as inflation etc. in selection of measurement bases. For example, whether historical cost might be a suitable measurement basis will be impacted by the degree to which a particular economy is affected by inflation.

Specific Matter for Comment 4

In your view, should:

a) *The effect of an entity's own credit risk be reflected in the measurement of liabilities at initial recognition; and*

b) *The effect of changes in own credit risk be reflected when liabilities are subsequently remeasured?*

The IDW does not support the arguments that this issue is of limited significance to the public sector (para. A2) and would like to refer to its comment on this issue to the IASB made several times in response to discussion papers and exposure drafts in recent years. The IDW does not see any public sector specific reasons that would alter its previously stated rejection of a general reflection of an entity's own credit risk in measurement of its liabilities. Indeed, in the current climate experienced in Europe, we believe that such reflection would be highly inappropriate.

We refer to our letter dated 24 July 2009 to the IASB, in which we pointed out three arguments against any reflection of an entity's own credit risk in measuring liabilities, which are briefly summarized as follows:

- Resultant gains are counterintuitive (they do not derive from an improvement in an entity's economic situation and may thus confuse users)
- Accounting mismatches between assets and liabilities may be increased (underlying declines in assets may not be evident in the financial statements)
- Realization of such changes may be only hypothetical (in many cases this will be the case as public sector entities report on the going concern assumption)

However, in this letter we also expressed the view that it is necessary to distinguish between obligations that are essentially exchanges for cash and those that are not. In the case of cash exchanges the credit risk will already have been taken into account on initial recognition (i.e., the price set takes account of the credit risk) but should not be reflected on re-measurement i.e., changes in that credit risk would not be reflected. Liabilities "held for trading" would be the exception to this. In contrast, for other obligations e.g., assets removal obligations on initial recognition, it would be appropriate to discount expected future cash flows at market rates that exclude the effect of credit risk, since managements future intentions would form the basis for expected future cash flows i.e., whether the liability will be fulfilled, transferred or settled, and subsequent discounting on re-measurements should use market rates that exclude changes in the entity's credit risk.

Specific Matter for Comment 5

In your view, where assets are not restricted in use and therefore may be sold for an alternative use, should the measurement reported in the statement of financial position reflect:

a) *Only the service potential relating to the existing use; or*

b) *Include the incremental value relating to its possible sale for an alternative use?*

In our view, it is not appropriate to seek a response to generalize this issue. Both measurements may provide useful information to financial statement users. However, the relevance for the statement of financial position will depend

on the individual circumstances, including the entity's intent and ability to put the asset to alternative use or to sell it. The interaction between the two measurement bases and the qualitative characteristics identified in CP1 ought to be decisive factors. In the public sector context, even when assets are not restricted in use the entity may have an obligation to provide particular services and be using the particular assets to do so, such that the extent to which the entity's actual ability to put the asset to alternative use or to sell it could be seen as realistic would need to be taken into account. The CP would benefit from a wider discussion of this aspect as it relates to the public sector context.

THE
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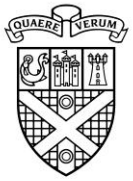
OF SCOTLAND



Response from
The Institute of Chartered Accountants of Scotland to the
International Public Sector Accounting Standards Board

CONCEPTUAL FRAMEWORK: MEASUREMENT OF ASSETS AND LIABILITIES IN FINANCIAL STATEMENTS

15 June 2011

INTRODUCTION AND KEY POINTS

Introduction

The Public Sector Committee of The Institute of Chartered Accountants of Scotland (ICAS) welcomes the opportunity to comment on the International Public Sector Accounting Standards Board's (IPSASB's) consultation paper "Conceptual Framework for general purpose financial reporting by public sector entities: measurement of assets and liabilities in financial statements". The Public Sector Committee is a broad based committee of ICAS members with representation from across the public services.

The Institute's Charter requires its Committees to act primarily in the public interest, and our responses to consultations are therefore intended to place the general public interest first. Our Charter also requires us to represent our members' views and to protect their interests, but in the rare cases where these are at odds with the public interest, it is the public interest which must be paramount.

Key points

While we understand that the IPSASB conceptual framework project is not a convergence project, we would support a Conceptual Framework for public sector entities which only departs from the IASB's Conceptual Framework in areas where there is a clearly justified public sector specific reason for doing so. The timing of the IPSASB project means that key decisions about the Conceptual Framework may be made in advance of commentators' deliberations and IASB decisions regarding its developing Conceptual Framework and as such there may be a risk that the IPSASB Conceptual Framework does not fully reflect these wider deliberations. We would therefore prefer publication of an exposure daft by the IPSASB on the measurement of assets and liabilities in financial statements to include consideration of any material published by the IASB in relation to Phase C of its conceptual framework project on measurement. However, we understand that the IASB has indicated that no further action will be taken on the measurement aspects of its project until at least December 2011.

Our comments on the specific matters for comment are set out in the following section of our submission.

COMMENTS ON THE CONSULTATION PAPER

Specific matter for comment 1
Should the role of the Conceptual Framework be to identify factors that are relevant in selecting a measurement basis for particular assets and liabilities in specific circumstances, rather than specify a single measurement basis or combination of bases?

Response
We agree that the Conceptual Framework should identify factors which are relevant in selecting a measurement basis rather than restricting public sector bodies to using a single measurement basis or combination of measurement bases.

Specific matter for comment 2

If in your view the Conceptual Framework should specify a measurement base or combination of measurement bases (or approach in the case of deprival value), which should that be?

Response

As we do not believe that the conceptual framework should specify a measurement base or combination of measurement bases (or approach), we have no further comments to add.

Specific matter for comment 3

In your view is the discussion (on measurement bases and approaches) complete, balanced and fair? If not, please indicate what in your view is missing or in what respects do you consider the discussion does not draw out the strengths and weaknesses of the various bases (or approach in the case of deprival value).

Response

In our view the discussion on measurement bases and approaches is balanced and fair. However, we believe that discussions are not complete without reference to the wider debate on measurement which is yet to be conducted by the IASB as part of its conceptual framework project. We would therefore prefer publication of an exposure daft by the IPSASB on the measurement of assets and liabilities in financial statements to at least include consideration of the IASB's planned exposure draft in relation to Phase C of its conceptual framework project on measurement. However, we understand that the IASB has indicated that no further action will be taken on the measurement aspects of its project until at least December 2011.

Specific matter for comment 4

In your view, should:

(a) the effect of an entity's own credit risk be reflected in the measurement of liabilities at initial recognition; and

(b) the effect of changes in own credit risk be reflected where liabilities are subsequently measured.

Response

We believe that taking own credit risk into account in measuring the fair value of a liability produces information that is illogical and does not meet the objective of relevance to decision making by users of the accounts. For example, an entity with a declining credit rating would conversely show increasing profitability in its financial statements if its credit risk was taken into account in valuing its liabilities. Including own credit risk in the measurement of a liability results in information that bears little relation to the economic reality of the situation it is attempting to describe, therefore should not be considered as part of a fair value measurement.

Specific matter for comment 5

In your view, where assets are not restricted in use and therefore may be sold for an alternative use, should the measurement reported in the statement of financial position reflect:

(a) only the service potential relating to the existing use; or

(b) include the incremental value relating to its possible sale for alternative use

Response

We have not formed a definitive view on this matter. However, at this stage we believe that service potential relating to existing use is probably the most suitable approach to measurement where the assets are being used, for example, as schools or hospitals. Even when there is no specific restriction on the use of such assets, it may be difficult to value these reliably on the basis of alternative use. There may be a stronger case of using alternative use where assets are being used as offices, for example, in the business district of a city.



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April 29, 2011

Ms. Stephenie Fox
The Technical Director
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Dear Ms. Fox:

1. The International Consortium on Governmental Financial Management (ICGFM) welcomes the opportunity to respond to the Consultative Paper on Measurement of Assets and Liabilities in Financial Statements. We are pleased to see the IPSASB move forward in developing the conceptual framework.

2. Working globally with governments, organizations, and individuals, ICGFM is dedicated to improving financial management by providing opportunities for professional development and information exchange. ICGFM conducts two major international conferences each year and publishes an international journal twice each year. Services are provided to its membership through an international network. ICGFM welcomes a broad array of financial management practitioners (accountants, auditors, comptrollers, information technology specialists, treasurers, and others) working in all levels of government (local/municipal, state/provincial, and national). Since a significant number of our members work within government and audit institutions around the world, our response to this exposure draft is one from an international perspective.

3. The following responses are provided for each specified comment:

Comment 1:
Should the role of the Framework be to identify factors that are relevant in selecting a measurement basis for particular assets and liabilities in specific circumstances, rather than specify a single measurement basis or combination of bases?

Response— Identification of factors in the Framework seems to be appropriate except it does not take into consideration the draft conceptual framework of the Public Sector Debt Statistics. Although this draft guide on Public Sector Debt Statistics includes a chapter on Work with Other International Agencies, it makes no reference (that we could find) to IPSAS or the accounting principles promulgated by IPSAS. Also, in paragraph 1.2, it would be helpful to the reader if they understood more about the GFSM 2001 as follows "The GFSM 2001 prescribes a statistical reporting system issued by IMF in 2001 to implement the 1993 System of National Accounts issued by the United Nations. The information presented in the statistical reporting system is generally extracted from the accounting system and modified as necessary to be in compliance with GFSM 2001."

Comment 2:
If, in your view the Framework should specify a measurement basis or combination of bases (or approach in the case of deprival value), which should that be? *Single Measurement Bases:* (a) Historical cost, (b) Market value, or (c) Replacement cost. *Combinations of Bases/Approach:* (d) Deprival value, (e) Historical cost and market value, (f) Replacement cost and market value, or (g) Historical cost, replacement cost, and market value. O*thers:* (h) Another measurement basis or combination of bases/approach. Please explain why you support a particular measurement basis or combination of measurement bases/approach and your reasons for rejecting alternatives.

Response—The "deprival value" is conceptually the most appropriate measure of value to an entity. However, its application to assets which deliver services rather than economic flows involves assumptions about the value of such services. The approach becomes too subjective and susceptible to manipulation to be useable. We favor measures that are objectively verifiable as long as the limitations of such measures are clearly stated. Hence we support historical cost, replacement cost, and market value as long as these values are verifiable.

Comment 3:
The Consultation Paper discusses the following measurement bases: historical cost, market value, and replacement cost. It also discusses the deprival value concept which does not describe a single measurement basis, but rather a means by which a basis may be selected that is relevant to the circumstances. Value in use and net selling price are discussed in the context of the deprival value model. In your view, is this discussion complete, balanced and fair? If not, please indicate what in your view is missing or in what respects you consider the discussion does not draw out the strengths and weaknesses of the various bases (or approach in the case of deprival value).

Response—We are comfortable with the information presented.

Comment 4:
In your view, should: (a) The effect of an entity's own credit risk be reflected in the measurement of liabilities at initial recognition; and (b) The effect of changes in own credit risk be reflected when liabilities are subsequently remeasured?

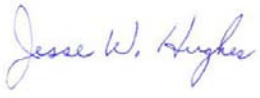
Response—We would support including the entity's own credit risk at initial recognition as well as subsequent revaluation in order to be consistently applied. Gains or losses on the revaluation of liabilities should be reported separately from operating flows, e.g. as movements on reserves.

Comment 5:
In your view, where assets are not restricted in use and therefore may be sold for an alternative use, should the measurement reported in the statement of financial position reflect: (a) Only the service potential relating to the existing use; or (b) Include the incremental value relating to its possible sale for an alternative use?

Response—We think it should only relate to the service potential for existing use. Otherwise, it is too speculative and subject to manipulation.

4. We appreciate the opportunity to comment on this exposure draft and would be pleased to discuss this letter with you at your convenience. No member objected to its issuance. If you have questions concerning the letter, please contact Dr. Jesse Hughes, CPA, CIA, CGFM at jhughes@odu.edu or 757.851.0525.

Sincerely,



ICGFM Accounting Standards Committee

Jesse W. Hughes, Chair
Masud Mazaffar
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Cc: Linda Fealing
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2nd September 2009

Comment Letter on IASB Discussion Paper: *Credit Risk in Liability Measurement* DP/2009/2

The arguments in this Discussion Paper and its accompanying staff paper (IASB, 2009b: hereafter referred to *collectively* as the 'DP') illustrate why it is not clear that accounting for liabilities at FV (cf. IASB, 2009a) is always useful. Nevertheless the issue of credit risk arises whatever the underlying measurement basis (although FV, which conceptually clearly requires *remeasurement* when credit risk *changes*, may make the question more acute).

As noted in the DP, at inception existing accounting practice normally measures a liability at 'the market price', i.e. the amount at which it was contractually incurred, and this will necessarily reflect own credit standing. If borrower A is riskier than borrower B, then *ceteris paribus* in a 'perfect market' (e.g. Bromwich, 2007; Hitz 2007; Dean, 2008; Whittington, 2009), borrower A will face higher interest payments (whose *risk-adjusted* present value is the same as those on B's borrowing); or equivalently, for the promise of the same interest payments, the amount A can borrow will be less than is available to B (representing the lower certainty-equivalent of A's *risk adjusted* future interest payments).

However accounting has not found a way to capture the consequent well-known 'Modigliani-Miller' effect on the risk to the equity holders—unless outweighed by the profitability of the expected investment of the borrowed money, together with any expected tax benefits etc. (which both increase equity holders' value), taking on the loan

(with the accompanying penalties that will follow even partial default) increases the probability of the worst case scenario, where the equity holders will receive zero.[1] (Note however, that if the liability represents an obligation under a contract for goods or services, it has long been normal accounting practice to recognise a loss on 'Day 1' on inception of any 'onerous contract'—as proposed by FASB/IASB (2008), cf. Walton 2006.[2] See further point #2. below.)

Because the anticipated future benefits of deploying the loan do not met normal accounting recognition criteria, it would be one-sided only to measure the downward effect on equity of the increased risk from borrowing (e.g. by suggestions that the initial measurement should be at a risk-free rate resulting in an initial loss—para 31.). As correcting one side of the error would only exaggerate the other side, accounting thus appears compelled generally to adopt a 'second best' solution (Lipsey & Lancaster, 1956) and inevitably fails to paint the full picture at inception of the liability[3] (other than through the accompanying disclosures about loan-terms, cash flow commitments etc. that other current and prospective creditors themselves need to assess the impact on their own risk), unless the effect is deemed so serious as to bring doubt that the entity is still a 'going concern'. But this initial failure cannot justify then further exacerbating it if the debtor's own credit risk subsequently deteriorates further. So while this DP's arguments in favour of showing the impact of changes in credit risk on the liability values themselves, if they are to be measured at FV, may generally be accepted to be conceptually consistent, the major controversy arises, as the DP acknowledges, from the

[1] The value to the equity holders of the limited liability 'put' (para. 34) is that it protects their value from becoming *negative*.

[2] Walton (2006) p. 339 argues that IAS37's notion in 1998 of an 'onerous contract' (requiring provision for any anticipated loss as soon as signed) 'represents a first step towards bringing executory contracts within the boundaries of financial reporting'. But such provision has been part of UK GAAP from long before the beginning of UK accounting standards in 1971 (see e.g. Recommendation N22 of the ICAEW, in 1960, paras. 22(b); 30 (Zeff, 2009)).

[3] The staff paper accompanying the DP also raises the issue of other 'provisions' e.g. for 'asset removal' i.e. decommissioning. It does not discuss whether for such provisions funded 'internally' the relevant discount rate should be determined by reference to the rate expected to be earned on the related assets (e.g. paras 13; 25). Note that a decrease in the entity's credit standing, resulting normally from increasing doubts about its earnings ability, would in this case have the right 'intuitive' effect: the discounting rate would likewise fall and the liability would increase, reflecting the increased burden of meeting it out of lower future earnings. This would also be consistent with the conventional approach to accounting for 'onerous contracts' discussed above.

related issue of the appropriate reporting of the change in value with regard to the measurement of the entity's income or 'profit'.

Three observations on this crucial aspect of the arguments are relevant:

1. As acknowledged in the DP, changes in credit risk have counter-intuitive consequences for earnings if these are measured as 'change in FV', unless the complementary falls in asset values could also be recognised. Recent empirical research by Barth *et al*. (2008) finds that in practice for a majority of 'ordinary' US firms downward asset revaluations[4] do outweigh the debt revaluation effect to give an overall value-relevant negative net effect on equity—but by definition any *reported* asset devaluations cannot include what (in addition to falls in previously unrecognised upward asset revaluations) may be the biggest impact for previously successful firms, i.e. the fall in the value of their unrecorded internal goodwill as their credit risk rises (e.g. Macve, 1984; Horton & Macve, 2000).[5]
2. In the case of liabilities representing contractual business obligations, such as 'deferred revenue' for long term contracts (e.g. Macve & Serafeim, 2009), there is widespread unease that using FV could often give a 'Day 1' profit. The latest FASB/IASB DP on 'Revenue Recognition' (December 2008) is therefore against using FV as the Boards' members are 'uncomfortable' about this outcome.[6] Obviously, their discomfort should be even greater at the idea that a 'Day 2' (or later) profit can arise simply through the contractor's credit rating having subsequently worsened (and therefore the FV of its liability fallen).
3. The issues get even more complex with pension and other post-retirement benefits and with life insurance liabilities: should we be accounting on the basis of immediate

[4] Insofar as these can be satisfactorily proxied by the reported fall in net income before extraordinary items (p.657). However, this fall could represent only the effect of *current* adverse trading results, without any recognition of consequences of the deterioration in expected future results that largely drives long-term asset impairments.

[5] The paradox is mirrored when credit rating *improves*. Now the FV of the liability rises so, with 'clean surplus' accounting, comprehensive income *falls* even though the entity's financial position has now improved overall.

[6] Although this 'discomfort' intuitively seems very wise, it is surely a new Conceptual Framework 'concept' that has not been exposed before?

transfer (FV / 'CEV'?[7]) or 'settlement over term' (i.e. a PV of future cash flows measure) (e.g. Horton *et al*., 2007). Either way, the issue of 'credit risk' requires special consideration. From the point of view of the pensioners and policyholders (and the regulators who act to protect them), should the institutions promising these future protections be allowed to show that their liabilities have got less—giving an improvement in their 'statement of financial position'—just when it has become less likely (in the eyes of the market) that they will be able to pay them in full? This is more likely to conceal the reality of what is happening to pensioners' or policyholders' security than to reveal it.[8]

4. The above three issues are symptomatic of a general failure by standard-setters *directly* to consider the income effects of their proposals for asset and liability valuation. In the case of liabilities that are financial instruments, if they are traded then FV works reasonably well (subject to issues about transaction costs); but where they are not traded, the paradoxes of 'Hicks's Income No. I' [has value changed?] vs. 'Hicks's Income No. II' [has maintainable income changed?] make deciding how most usefully to report earnings *conceptually* intractable[9]—what is needed is more focus on what are the most socially useful *conventions* to adopt to meet the objectives of financial reporting (e.g. Bromwich *et al*., 2009).

It is a major matter of concern that standard setters' ingrained, almost exclusive focus on 'assets and liabilities' has now almost driven out any direct conceptual debate on 'income measurement' / 'earnings' (other than tinkering with presentation). But earnings / profit is what users seem primarily interested in for 'ordinary' companies (e.g. Penman, 2007). As noted above, the FASB and IASB Board members have now wisely stated that they need to be 'comfortable' with the profit patterns resulting from measurement choices (FASB/IASB, 2008). Hence what is best for the balance sheet may be different for the

[7] CEV = 'Current Exit Value' was proposed in the IASB 2007 Discussion Paper *Preliminary Views on Insurance Contracts*. At that time, the Board could not identify any difference between this and FV (Horton *et al*. 2007). Now this DP indicates a move towards preferring 'fulfilment value' (para. 3a)).

[8] IASB (2009c) now illustrates the related difficulties and counterintuitive corporate performance results that have arisen in the current financial crisis when it is not so much the pension sponsors' own credit risk but the yields on the 'high quality corporate bonds', that provide the benchmark for determining their pension liabilities, that have been seriously affected.

[9] A Hicks No. II approach would exclude the effect of interest rate changes from income (whether or not 'realised') (e.g. Macve, 1984; Horton & Macve, 2000): cf. DP paras. 41; 60.

income statement and the two different approaches may then need to be 'reconciled', perhaps along the lines of the IAS39 treatment for the 'Available for Sale' category of financial instruments. This line of enquiry should be explored further (e.g. Horton & Macve, 1996; see also now a recent paper by Kothari *et al.* 2009).

Alternatively, perhaps it should be decided that consequences for reported income should dominate the standard-setting decision (e.g. Ohlson, 2006). For example, in the case of Executive Stock Option expensing (IASB, 2004), it seems clear that it was the mounting pressure to improve 'earnings' for the allegedly hidden 'cost' of employment services that outweighed the evidence that the stock market also recognises the 'benefit' of the incentives ESOs can provide (Landsman *et al*. 2006). Given that ESOs have no effect on reported assets and liabilities (as the only balance sheet effect is in equity), it was surely the income reporting issues that drove this accounting change (Bromwich *et al*., 2009). Similarly with credit risk changes, it should surely be the fact that the consequences for 'income' of the proposed balance sheet valuation changes make people 'uncomfortable' that should also make the IASB Board members 'uncomfortable' and lead them to find another solution to how to report liabilities at a relevant current value (with sufficient supplementary disclosure for equity and credit analysts' needs) while also reporting useful earnings figures.

I am happy to discuss these issues further. Needless to say, these views are my own and cannot be taken as representing the views of colleagues at the LSE, individually or collectively.

Yours faithfully.
[signed electronically]
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'DEPRIVAL VALUE' VS 'FAIR VALUE' MEASUREMENT FOR CONTRACT LIABILITIES IN RESOLVING THE 'REVENUE RECOGNITION' CONUNDRUM: TOWARDS A GENERAL SOLUTION

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‘DEPRIVAL VALUE’ VS ‘FAIR VALUE’ MEASUREMENT

FOR CONTRACT LIABILITIES IN RESOLVING THE ‘REVENUE RECOGNITION’ CONUNDRUM: TOWARDS A GENERAL SOLUTION

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ABSTRACT

Revenue recognition and measurement principles can conflict with liability recognition and measurement principles. We explore here under different market conditions when the two measurement approaches coincide and when they conflict. We show that where entities expect to earn ‘super-profits’ (residual income) the conceptual conflict is exacerbated by the adoption of ‘fair value’ (FV) as the measurement basis for assets and liabilities rather than the more theoretically grounded approach of ‘deprival value/relief value’ (DV/RV) which better reflects the impact of, and rational management response to, varying market conditions. However, while the balance-sheet liability and the revenue recognition problems, and the related problems of income statement presentation, can be resolved by the application of DV/RV reasoning, this is not sufficient fully to resolve issues of the appropriate timing of profit recognition. Performance measurement issues still need to be addressed directly. The standard setters’ current ‘revenue recognition’, ‘insurance contracts’, and ‘measurement’ projects therefore need broadening to consider the pervasive issue of accounting for internally-generated intangibles.

[162 words]

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I. INTRODUCTION

In June 2010 FASB and IASB issued a joint Exposure Draft (ED) on revenue recognition (FASB/IASB, 2010). The Boards had previously stated (FASB/IASB, 2005, p.9) that they 'have found their definitions of liability insufficiently helpful in distinguishing revenues from liabilities (for example, when payment for products or services is received in advance)'. After many conceptual twists and turns—with the Boards sometimes adopting different approaches from each other—the joint Discussion Paper (FASB/IASB, 2008) debated whether performance obligations under contracts should be measured at fair value (FV). The Boards stated (at para. 5.20) that they were 'uncomfortable' with the potential implication of fair-valuing contract assets and liabilities at inception in that it could lead to recognition of 'Day 1' revenue and profit 'before the entity transfers to the customer any of the goods and services that are promised in the contract'.

While the measurement of FV has been extensively discussed in several voluminous publications (most recently in IASB 2011), 'discomfort' is not a concept that has been discussed in either of the Boards' Conceptual Frameworks (CF), or in their current joint CF revision project (e.g. Bromwich *et al*. 2010; Macve, 2010b). Under the 2010 ED it is proposed that the initial measurement of the performance obligation should normally be at the transaction price, with revenue (and thereby related profit) recognized when the promised goods or services are transferred to the customer. FV has been abandoned here.[4]

A major industry where the issues have been very fully explored by IASB and FASB is insurance. In another series of voluminous papers (see Horton *et al.*, 2007;

[4] A comparison of FASB/IASB proposals on Revenue Recognition, Insurance Contracts and Fair Value Measurement is available from the authors on request. See also Barker and McGeachin, 2010.

Macve, 2011) the two Boards have veered first one way and then the other between applying the FV approach to insurance liabilities[5] (where a profit on inception could often result) and proposing that they should normally be initially stated, as in much current practice, by reference to the amount charged for new contracts (with the profit emerging thereafter over the life of the contract). The Boards both favour the latter approach, as proposed in the IASB's July 2010 Exposure Draft (IASB, 2010a), but still differ over the 'building blocks' that make up the total liability amount and how they should subsequently be accounted for. However, the traditional income statement presentation of 'premiums less claims and other costs' is generally to be replaced by an analysis of the margins being earned and of variations in assumptions (FASB, 2010).

The Boards' discussions of FV (e.g. Foster & Upton, 2001; FASB, 2006; IASB 2011) have only added to the confusion. While FV is defined by both Boards as an 'exit price' they also recognize a 'cost approach' as a 'valuation technique' to arrive at FV for assets that are used in the business. Here, exit price becomes 'replacement cost' (RC) because '[i]n effect, the market participant buyer steps into the shoes of the entity that holds those specialised assets' (IASB, 2009: BC61). 'Given the "economic principle of substitution", fair value cannot exceed current replacement cost for the asset's services' (BC 63). So replacement cost will continue to be used for in-use tangible assets, except presumably where an 'income approach' (i.e. using discounted cash flows) provides a lower value for the recoverable amount (BC62).

Here the Boards seem to be groping towards an element of the 'deprival value' (DV) reasoning that we shall argue for here, but without wishing to abandon the claimed 'objectivity' of FV by conceding that in certain situations the value is indeed

[5] Labelled 'Current Exit Value' in the IASB's 2007 Discussion Paper (see Horton *et al.*, 2007).

the owner's own 'entity-specific' estimation of its value.[6] Here they are beginning (albeit without identification of their sources) to pick up elements of the standard microeconomic analysis of price formation in competitive, fully-informed markets (e.g. Katz and Rosen, 1998), and so have to make heroic assumptions about how information asymmetries or gaps between the entity and the hypothetical prospective 'market participant' buyers of its assets are to be overcome in practice (cf. Akerlof 1970). All this conceptual twisting and turning could have been avoided if the Boards had openly adopted the principle underlying DV—which provides a much clearer conceptual foundation for measurement but which they continue to dismiss (Macve, 2010a).

The Boards' more recent approach to FV of assets also raises the question of how far it may in turn be consistent with the 'relief value' (RV) approach to liability measurement that we shall analyse here. While the Boards acknowledge (e.g. IASB 2011: 41(b)) that in certain circumstances the FV of a performance liability might reflect the consideration received for entering into a contract, they have not so far generalized this approach sufficiently to have been able to adopt FV for either their Revenue Recognition or their Insurance Contracts projects, leaving inconsistency in the timing of revenue and profit recognition.

While no one measurement basis can be shown to dominate for all users and all decision uses (e.g. Dean *et al.* 2010),[7] our paper seeks to provide a conceptual rationale for preferring the DV/RV approach over FV for financial accounting, which is also more consistent with current conventions for revenue and profit measurement and for income statement presentation. Section II first sets out our main argument in

[6] The 'economic principle of substitution' was of course the original insight underlying the DV approach to valuation in imperfect markets (e.g. Baxter, 1971).
[7] All valuation measures are subject to the 'aggregation' problem (e.g. Edey, 1974), requiring a choice of what standard setters refer to as 'the unit of account' (e.g. FASB/IASB, 2005).

favour of RV for liabilities, which adopts the DV logic for assets, *mutatis mutandis*, and therefore corresponds to finding the amount by which an entity would be better off if it were relieved of the liability. We maintain that this argument is of *general application* to all kinds of business contracts. To illustrate this we take a simple one-year magazine subscription. In Appendix A we discuss how these same principles can be applied to insurance contracts.

In the subsequent section (Section III) we illustrate this argument under two key market situations.[8] We then briefly introduce the issue of changes in prices and other assumptions in section IV. Section V explores briefly how DV/RV reasoning may relate better to desirable income properties. Section VI concludes.

We aim to show the generality of the theoretical proposition that, given the familiar Hicksian (1946) 'No. I' conceptualisation that 'economic wealth' at the beginning of an accounting period equals the present value of expected future net cash flows (PV), and 'income' equals change in wealth during that period,[9] DV/RV reasoning *always measures* (under common market assumptions and consistent with a business objective to maximise wealth) *the difference in that PV between having and not having an asset/liability*. While DV is relevant to managerial and regulatory decisions (e.g. Byatt in Weetman, 2007; Macve, 2010a), FV by contrast generally fails the tests of relevance and reliability for a measure of business performance (e.g. Penman, 2007; 2011). Its focus solely on exit price at the measurement date may be

[8] Extension to insurance contracts is introduced in Appendix A; and extension to interest effects in Appendix B. Further supporting analysis is available from the authors on request.
[9] We consider alternative definitions of economic income in section V below.

purely hypothetical, as immediate disposal is often not the best option, and it ignores transaction costs, which must be relevant to value and to decision making.[10]

Supplementary disclosure of FV may be argued to have value in providing information on a business's financial flexibility. Nevertheless even here 'net realisable value' (NRV), which allows for transaction costs to be incurred on disposal, would reflect this aspect better (e.g. Edwards and Bell, 1961; Chambers, 1974) and could provide more useful supplementary disclosure for investors (cf. Horton *et al*., 2007)

We shall show that the revenue recognition problems for identified contracts (and the problems of income statement presentation) can be resolved by the application of DV/RV reasoning. However, major conceptual difficulties still require resolution, in particular over deciding how to treat situations where entities expect to earn 'super-profits', i.e. profits that cannot be regarded as factor costs in the way that 'interest' and 'reward for risk bearing' may. Moreover, in cases where companies may have invested in building up the necessary internal intangibles that enable them to achieve apparent super-profits thereafter, current GAAP accounting for those intangibles is unable properly to match investment and return. Performance measurement issues therefore still need to be addressed directly. The standard setters' current 'revenue recognition' and 'insurance contracts' projects need broadening to consider the pervasive issue of accounting for intangibles, and more generally the inadequacy of their current model that identifies 'comprehensive income' solely in terms of changes in recognized assets and liabilities (IASB 2010b, paras. 4.25; 4.47; 4.49).

[10] Van Zijl and Whittington (2006), in attempting to provide a reconciliation between FV and DV, rightly argue that in order to be consistent with rational decision-taking current value must include the impact of related transactions costs.

II. THE ARGUMENT

We contrast here liability measurement under the concepts of RV and FV. While FV is defined by FASB/IASB as an exit price, RV is an economic way of thinking which only under restricted conditions is equal to FV. Specifically RV corresponds to the benefit an entity would enjoy if the liability disappeared. Unlike FV, which is one of a number of possible *measurement bases*, DV/RV provides a *decision rule* for choosing the relevant measurement basis for a given economic situation.

Defining PV as 'the present value of future cash inflows/outflows from continuing with the asset/liability' (often called 'value in use'), it is well known that, at an elementary level, DV for assets can be calculated as follows (e.g. Baxter, 1975, chapter 12).

$$DV = \text{Min}\,[RC;\ \text{Max}\,(PV;\ NRV)] \qquad (1a)$$

or DV is equal to the lower of RC and 'recoverable amount' (i.e. the higher of NRV and PV).

Substituting 'replacement loan/advance' (RL) for RC, and 'net transfer value' (NTV)—i.e. the payment needed to transfer the obligation to a third party—for NRV, then correspondingly,

$$RV = \text{Max}\,[RL;\ \text{Min}\,(PV;\ NTV)] \qquad (1b)$$

or RV is equal to the higher of 'replacement liability' and what might be labelled 'obligation satisfaction' (i.e. the lower of PV of amounts to settle the liability directly in due course and NTV).

Clearly, unless prices are extremely volatile, or a serious commercial mistake has been made, DV/RV at initial recognition will normally be equal to its 'historical cost/amount' (HC).

It is also obvious from the algorithm above that, provided markets exist, DV is always constrained between current (gross) replacement price and current (net) exit price, and only utilises 'value in use' (PV) where neither replacement nor disposal would currently be contemplated as economically rational. In frictionless markets, the difference between entry and exit price will be small so that effectively DV here converges to just 'market price', and therefore also equals FV.[11]

The same result holds for RV. However, Baxter (2003, pp.19-20) withdrew his earlier (1975) support for RV as representing the 'mirror' image of DV, on two main grounds. The first was that for financial liabilities (such as a company's debentures) it was difficult clearly to envisage what the concept of 'replacement loan' implied without imposing a lot more structure on the model (including available investment opportunities, possible capital rationing, etc.). We do not pursue that issue here (Baxter's argument here is supported by Kulkarni, 1980; cf. Horton and Macve, 2000);[12] but we shall here set out how RV for performance liabilities corresponds well to DV for assets.

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[11] Baxter, 2003, p.3, argued for caution against the intuitive sense that the advantage conferred by an asset is usually the higher of NRV or PV from future use (i.e. 'recoverable amount'). 'Our more familiar approach to value conjures up visions of benefits that would follow the acquisition of an extra asset. The deprival principle tells us to look instead at the disbenefits following the loss of an existing asset'. Hence where RC is lower than recoverable amount, DV is RC. It may be objected that, if PV > RC (or NRV > RC), the rational firm will surely have acquired every available asset and so there may not be a replacement asset ready to be acquired (or more generally, having equated marginal cost and marginal revenue, the last asset to be acquired must have PV = RC so on deprival either PV or RC gives the DV). However the widespread existence of long-lived assets for which PV > RC indicates the prevalence of market imperfections such that firms generally have not been able to exhaust all opportunities for investment in assets earning more than RC (i.e. with positive NPVs or yielding 'abnormal earnings'), with the consequence that valuing them at FV will show an immediate gain of the kind that Nobes (2003) argues for. (Where replacement is indeed impossible, RC is effectively ∞ and then DV is correspondingly recoverable amount.) We shall argue that similar market situations prevail *mutatis mutandis* for performance obligations such that RV is RL and not 'obligation satisfaction'.

[12] We also note that for corresponding financial assets, such as receivables, the DV is generally simply the (risk-discounted present value of) the amount due. The applicability of DV reasoning for traded financial instruments is analysed further in Macve and Jackson (1991).

Baxter's second objection to RV was that liability values do not in fact mirror the pattern of assets' values over their life. He says (2003, p.16) that an 'asset's value pattern starts with replacement cost, then can have a tail of falling use-values, and ends with net realisable value. This duly includes the three values of the [DV] diagram.' But (after considering different possible situations faced by a firm) he concludes that 'a liability's relief pattern can hardly ever contain figures comparable to an asset's three possible values….Its value remains firmly at repayment cost, and is not a mirror image of an asset's value.'

But his argument here is incorrect: a long-lived asset's DV does ***not*** during its life progress from RC through PV to NRV. As long as PV remains high enough it stays at RC (albeit 'depreciated' RC as it ages) until it is time to dispose of it, when any remaining NRV (which may be zero if there is no final scrap value) will now be at least as large as both PV and (depreciated) RC. [13] So Baxter's description here of how asset values behave is incorrect, and therefore his resulting objection to RV here is incorrectly based. As we shall argue, in the absence of price changes, the RV of a profitable performance obligation falls during its life from the initial consideration (= RL at that time) through 'amortized' RL until the last payment is made (normally the final instalment of PV but sometimes NTV if that can be arranged more cheaply). It therefore completely mirrors a profitable use-asset's DV pattern. In both cases, deprival/relief brings the need/opportunity to replace earlier than the originally planned date of expiry.

[13] This correct pattern is consistent with the graphical illustration on p.35 of Baxter (1971) and is fully illustrated in Fig. 13.7 on p. 165 of Baxter (1975). The Appendix to Baxter (2003) on 'Depreciating Assets' does set out the value pattern correctly, albeit in a more simplified way targeted at practitioner readers.

As neither of his objections applies to performance obligations (which Baxter (2003) does not explore) we shall now set out to do that here.[14] But first a warning: although it is effective in getting the message across that normally RC gives an upper bound on asset value (even though the asset is expected to yield a higher PV or NRV) because of the normal market opportunity to replace (what IASB, 2009 labels 'the economic principle of substitution'), there can be serious dangers in over-reliance on this simple pedagogical formulation and on the 'decision trees' and 'ranking tables' frequently derived from it (e.g. Van Zijl & Whittington, 2006; Weetman, 2007; cf. Macve, 2007). For example, for depreciating assets over the subsequent course of their useful life, Baxter's *Depreciation* (1971, pp. 34-6) showed that RC generally needs interpreting, not as the current second-hand market purchase price, but as 'the adverse consequence of deprival on the present value of all future cash flows, given that the asset now has to be replaced earlier than planned'.

As we shall show, similar complexities arise with performance liabilities when the contract period extends beyond the end of the accounting period, so that there has been part-performance to date. These situations do require management estimates of optimal actions so, like PV, the resulting DV/RV might be criticised as 'too subjective' for financial reporting. However, as markets get deeper, RC and NRV for assets become ever more readily observable and then, as Baxter demonstrated, *DV must always be bounded by these market prices* so the only subjectivity lies in fixing where on the spectrum in between them (and including them) DV lies. RV for liabilities represents the same case. So DV (and equivalently RV) tends towards FV in

[14] Kulkarni (1980) does not consider 'performance obligations'. Baxter (2003, p. 14), with reference to a very early version of our current paper, says: 'If the balance sheet includes deferred revenue (as where a magazine publisher gets subscriptions in advance), measurement must probably be a crude compromise as the issues are complex'. He does not give any further analysis and this has motivated our paper to analyse these 'complex issues' and to argue that for these kinds of liability the RV 'mirror' does apply.

'perfect markets' but copes much more adequately and simply than FV does with typical real-world market imperfections, where buying and selling prices differ and there are transaction costs or other frictions. Here FV fails appropriately to measure the impact of the asset/liability on the net present value of all future cash flows in the way that DV/RV correctly does (subject to the aggregation problem common to all valuation approaches below the level of the whole firm).

The particular focus of this paper is on the relationship between liability measurement and revenue recognition. We therefore next explore the accounting for the liability on an uncompleted contract's 'revenue in advance of costs'. This focus is readily illustrated by a simple example like accounting for prepaid magazine subscriptions but is obviously generally applicable to a spectrum of common business activities (including insurance, see Appendix A). We rely on a general model, making the minimum number of assumptions necessary, to highlight that the problem of accounting for incomplete performance is generic rather than industry-specific, and to show how there is no essential conflict between the 'release of liability' and the traditional 'revenue earned / performance based' approaches to revenue recognition and related profit recognition. Specifically, the only necessary assumptions beyond reasonably functioning markets are the nature of competition in the industry, and a contract where (at least some of) the consideration is receivable in advance of performance.[15] The analysis will hold whether markets are in long-run equilibrium or only in short-run equilibrium, or indeed in disequilibrium (the consequences of any resulting volatility in prices or in other economic assumptions are considered in section IV).

[15]This situation has the attraction of being the mirror-image of the more commonly discussed accounting problems (e.g. for inventories or plant and equipment) where cost outlays occur first and revenues flow in later.

The paper builds on many of the ideas in Lennard (2002) and counters the views of Nobes (2003). While Nobes argues for exit valuation of liabilities (and corresponding recognition of profit on inception of contracts), Lennard's essay seeks to justify a RV measurement basis as against IASB's/FASB's dominant focus on FV or proxies for it. The difference in emphasis is that our paper aims to provide a more strictly 'value measurement' argument, derived from analysing alternative market conditions, about why the 'deferred revenue' is the relevant RV of a liability (i.e. the answer to the general question: 'What difference would it make—to the PV of future cash flows—if the contract liability were "removed"?'). In contrast, Lennard's paper (e.g. para.25(ii); para.34) appears to rely more, as the FASB/IASB projects do, on arguments as to 'when does the performance occur?'. In a nutshell, we argue that, just as Baxter showed that the value (DV) of a profitably employed asset is that it saves the business having to make the outlay to replace it before the best time, so correspondingly the burden (RV) of a liability to perform on a profitable contract is that it prevents the business getting the inflow from signing up a replacement contract until the current customer is satisfied.[16]

We advance three main arguments. The first conclusion of our paper (consistent with Lennard's) is that the asset/liability and deferral/matching approaches can be reconciled via DV/RV and thereby avoid forcing unconventional revenue and profit recognition patterns. In this respect it is consistent with the Boards' latest proposals for both the revenue recognition and the insurance projects.

However, a more significant, second, conclusion is that adopting DV/RV is not sufficient to resolve all the conceptual issues relating to profit recognition patterns:

[16] See again fn. 9 above. It may seem to make intuitive sense to say that the burden imposed by a liability is usually the lower of transfer value or settlement in due course (i.e. 'obligation satisfaction') but (mirroring assets *mutatis mutandis*) we need instead to focus on what opportunity relief from the current obligation will provide.

those issues still need addressing directly and are primarily related to the recognition and measurement of intangibles, both purchased and internally-generated.

Thirdly, the model in this paper also illustrates that it appears unnecessary, when adopting a 'value-based' approach to liabilities, wholly to abandon traditional styles of income statement presentation. Retaining the traditional forms should better assist users in trying to understand how far the results of the current period 'true up' against previous assumptions (e.g. Penman, 2007).

In illustration of our general theoretical argument we explore in the next section a simple example of how some possible situations would be accounted for and presented in the financial statements under our approach. These will be summarised in Table I, which gives a simple numerical illustration. Appendix B extends the argument to the case of positive interest rates, for greater generalisability, with Table BI giving the algebraic illustrations.[17]

III. THE SETTING

Our aim is to demonstrate how far the application of RV rather than FV reasoning in the measurement of contract liabilities can help to resolve the apparent conflict between 'asset/liability' approaches and 'deferral/matching' approaches. In order to bring out the basic issue we focus initially on the special case where the interest rate is zero per cent (i.e. we *exclude* interest effects as in Forfar & Masters, 1999). This will enable us to illustrate our three main arguments and show the relationship to ordinary accounting conventions more clearly. Interest effects are considered in Appendix B and Table BI, where they are shown not to alter the main conclusions.

[17] Further, more complex, examples showing how the basic approach is readily adapted to a wider range of possible situations are available from the authors on request.

Our setting has the following simple assumptions. The Revrec Corporation receives payment in advance of performance on 1 July. In the simplest case one could think of Revrec as a magazine publisher collecting an annual subscription for 12 monthly issues of a magazine. Its year end is 31 December.[18] Costs over the contract are expected to be £y, for simplicity assumed to be incurred evenly with production and distribution (i.e. £$\frac{y}{12}$ per month) and such that marginal costs equal average costs. Ignoring risk, under perfectly competitive equilibrium conditions, Revrec will only be able to charge £y and profit will be zero, consistent with the predictions of micro-economics that in long-run equilibrium only factor costs are covered in fully competitive markets (e.g. Katz and Rosen, 1998). So if the total costs and revenues for the year are both £114 (= £9.50 per month), traditional revenue recognition conventions, given £114 due up-front, would allocate £57 to the half-year to 31 December, leaving unearned revenue at that date at £57, just sufficient to cover the second-half year costs. £57 is also the RV as in perfect markets it represents both the amount by which the PV of future cash flows would improve if Revrec were now able to abandon this contract and issue a replacement contract six-months earlier than previously planned (i.e. overall gaining six months additional revenue but facing the same costs) and the amount that competition would ensure had to be offered either to refund the customer on cancellation, or to pay another publisher to take over the reminder of the contract. In such perfect markets, with no transaction costs, it will

[18] In our simple illustration we have assumed that the contract lasts a year and is initiated 6 months before the end of the accounting period. Our results clearly generalise regardless of whatever point of time during the accounting period the contract is initiated at. Moreover, if there are seasonal factors affecting the business, the allocations of revenue and costs to sub-periods can easily be adjusted from simple time allocation to reflect these as appropriate, as suggested in the Insurance Contracts exposure draft (IASB, 2010a). Contracts of more than one year's duration would be handled by extension in essentially the same way (see further Appendix A).

also represent FV. The corresponding illustrative numbers are presented as conventional accounts in Solution 1 in Table I.[19]

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Insert Table I about here
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However, Revrec also needs to cover risk, assumed to require an additional risk premium of £RP per contract-year.[20] Therefore, the certainty equivalent will be the sum of performance costs and risk bearing.

$$CE = y + RP \tag{2}$$

and the certainty equivalent of expected performance costs is £$\frac{CE}{12}$ per month).[21]

We examine what is Revrec's revenue and profit if all expectations are realised and if it charges either:

(i) £CE for a year's subscription (i.e. £$\frac{CE}{12}$ per monthly issue) or

(ii) £CF (i.e. £$(\frac{CE}{12}+\frac{\xi}{12})$ per monthly issue), where ξ is the 'abnormal profit' or super-profit earned due, for example, to imperfectly competitive conditions, so that:

$$CF = CE + \xi = y + RP + \xi \tag{3}$$

With our illustrative numbers, and assuming that the risk premium is £0.50 per month, so that factor costs now total £120 p.a., and that super-profit for the whole contract is

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[19] In order to be able to handle positive interest rates consistently (see further Appendix B), whatever the accounting conventions adopted, we assume that in all cases Revrec distributes half the total profit on the contract by the end of the first accounting period, i.e. 31 December, and the remainder during the following period by the end of the contract on the subsequent 30 June.

[20] For simplicity we assume here that there is no risk of Revrec's insolvency (cf. Horton & Macve, 2000; and Horton *et al*., 2007). We also do not discuss here whether the 'risk premium' should reflect the whole of the company's risk or only its 'systematic' risk (cf. IASB's DSOP (2001) chapter 5): IASB 2010a proposes to limit recognition of diversification effects to similar classes of insurance contracts.

[21] Without loss of generality we assume for illustration that the risk pattern is even throughout the period: alternative patterns could be accommodated where appropriate, as suggested in IASB, 2010a.

£12, the corresponding accounts are given as Solution 2 and Solution 3 in Table I. Under (i) the total contract revenue is £120 and under (ii) £132.

For example, one could think of our market setting in (ii) in terms of the outcomes analysed in cooperative game theory (e.g. Green *et al*. 1995), where the firm's bargaining power is going to determine the division of value. If the firm is able to raise the willingness-to-pay of customers or lower the opportunity costs of its suppliers and as a result appropriate more value compared to competitors, it will obtain super-profits, at least in the short term.[22] As we next analyze, it is the presence of firms which exhibit asymmetry to their competitors and are able to capture higher value, that cause conflicts between the 'asset/liability' and the 'revenue recognition' accounting approaches when exit values such as FV are adopted.

(i) *Solution when Revrec charges £CE*

Solution 2, in Table I, first illustrates the key economic situation of 'perfectly competitive markets': as Revrec is charging no more than what is needed to cover all costs including required 'normal economic profit' (i.e. interest and risk), so accounting profit is £RP= (CE – y) in total if expectations are realised (i.e. interest [£0] and reward for risk bearing [£RP]). *Pro rata* 'revenue earned' and 'profit earned' to 31 December are $£\frac{CE}{2}$ and $£\frac{RP}{2}$ respectively. In this case the balance sheet liability at 31 December is unambiguously $£\frac{CE}{2}$, representing, in competitive markets, both the consideration that would be charged for the six-months' remaining magazines and the amount it will cost to perform the remaining half of the contract

[22] Cooperative game theory is ideal for our purposes since it allows the business situation to remain unstructured, imposing no formal structure on the interactions between companies, thereby reinforcing the generalisability of our results.

(including the cost of risk-bearing). It is also the amount a customer would expect to be reimbursed if the contract is cancelled at that point ('cost of release'). Again, in competitive markets, with no transaction costs, RV = RL = PV = NTV (and = FV). With our illustrative numbers, revenue and profit for the first six months are £60 and £3 respectively (where the accounting profit represents the earning of the risk premium), and the liability at 31 December is £60 on all measurement approaches.

The presence of transaction costs would alter the picture and potentially drive a wedge between RL and NTV, normally making the former lower and the latter higher (just as they can between RC and NRV for assets, normally making the former higher and the latter lower). This does not alter our result: clearly PV for liabilities must now also be sufficiently lower (higher for assets) or firms will not take on the obligation (investment) and, provided PV is still sufficiently low (high for assets), RV would still be RL (just as DV is still RC) but now FV (which ignores transaction costs) is too low (and too high for assets, as argued by Van Zijl and Whittington, 2006).

(ii) *Solution when Revrec charges £CF*

In Solution 3 in Table I, Revrec is charging £$\frac{\xi}{12}$ per issue/month more than what is needed to cover all costs including 'normal economic profit' (i.e. interest and risk). So accounting profit is £(TP) in total if expectations are realised (i.e. interest [£0] plus reward for risk bearing [£RP] plus super-profit [£ξ]); *pro rata* 'revenue earned' and 'profit earned' to 31 December would conventionally be £($\frac{CF}{2}$) and £($\frac{TP}{2}$) respectively.

$$TP = RP + \xi \tag{4}$$

With our illustrative numbers, revenue and profit on this basis for the first six months are £66 and £9 respectively (where the accounting profit represents the

earning of the sum of the risk premium and the super-profit). The corresponding liability on the contract at 31 December would be shown as £66 (equal to the unearned revenue). But should it be only £60 (with additional profit of £6 recognized in the first six-months) as argued by Nobes (2003)?

In this case ('less than perfectly competitive markets') the balance sheet liability at 31 December is potentially one of the following:

(a) £($\frac{CF}{2}$), representing the consideration that could be charged for the remaining six-months magazines/insurance—in our illustration, £66.

(b) £{$\frac{CE}{2}$ = ($\frac{y}{2}$ + $\frac{RP}{2}$)}, being the amount it will cost to perform the remaining half of the contract (including the cost of risk-bearing)—in our illustration, £60.

(c) £($\frac{CF}{2}$) would also appear to be the amount a customer would expect to be reimbursed if the contract is cancelled at that point ('cost of release')—in our illustration, £66.

Clearly Revrec would plan to perform rather than cancel the contract, as this is the more profitable alternative. Consistent with Lennard's (2002) RV approach, (c) does not therefore seem to be a relevant amount on a 'going concern' basis.[23] If (a) is adopted (equivalent to the 'deferred revenue' on a conventional 'matching' approach), revenue and profit for the first 6 months are the conventional £{$\frac{CF}{2}$ = ($\frac{CE}{2}$ + $\frac{\xi}{2}$)} and

[23] If (c) is greater than (a) or (b) and is payable even where cancellation is at the customer's option there is a positive probability that the option will be exercised against the company, and here it may indeed be the most relevant value. However, the business is not sustainable as a going concern on this basis (i.e. if customers all act 'rationally'). Alternatively if contracts allow the company, at its option, to exit by paying less than CE/2 it would be rational to take this opportunity and this would represent RV—but again this is not a sustainable business model as customers collectively would be irrational to enter such contracts. (Further analysis of 'unusual' situations is available from the authors—e.g. Macve, 2007). Related issues about policyholder options have been discussed within FASB/IASB's insurance project in the context of a 'deposit floor' (FASB, 2010).

£($\frac{RP}{2}+\frac{\xi}{2}$) respectively—with the same to come in the second six months. The corresponding accounting is set out in Table I, Solution 3(a).

However, (b) would appear to be the FV of the liability as defined by FASB/IASB, and is the relevant value according to Nobes (2003).[24] Under FV accounting, profit for the first 6 months would therefore rise to £($\frac{RP}{2}+\xi$) {i.e. interest [£0] plus reward for risk bearing [£$\frac{RP}{2}$] plus all of the 'NPV' of the super-profit [£ξ]}—with just £$\frac{RP}{2}$ normal profit to come in the second six months. In Solution 3(b) in our illustration, this gives £15 as the profit in the first six-months with just £3 normal profit to come in the second six months

Contract revenue could still be stated at £{$\frac{CF}{2}=(\frac{CE}{2}+\frac{\xi}{2})$} for each six months (in our illustration £66): but only if the value of the anticipated further excess revenue (i.e. £ $\frac{\xi}{2}$) (in our illustration £6) is also recognized in the first six months and is then 'recycled'/'reclassified' out again in the second six months in a manner similar to revaluations of 'available for sale' securities which may be recycled/reclassified to profit and loss on realisation (IASB 2007a).

Lennard's (2002) RV is £($\frac{CF}{2}$) = £66, i.e. the higher of consideration [£($\frac{CF}{2}$) = 66] and the lower of {remaining performance cost [£($\frac{y}{2}+\frac{RP}{2}$) = 60] and cost of release [£$\frac{CF}{2}=(\frac{y}{2}+\frac{RP}{2}+\frac{\xi}{2})$ = 66]}. Under what circumstances is it realistic to

[24] As FV excludes transaction costs (b) should be sufficient to compensate another entity for taking over the contract and fulfilling it.

regard this rather than £($\frac{CE}{2}$) = £60 as the liability at 31 December? The key argument here is that one has to ask 'what are the market circumstances that can give rise to this situation?'. If one presumes that Revrec is behaving rationally and optimally, it will have already taken on as many such contracts as can be handled while adding to profits—but no more (i.e. it will have as far as possible equated marginal cost and marginal revenue). Reasons not to take on an additional contract might include adverse consequences of having to lower the price and/or rising costs (whether operating, financing or organisational) of further expansion, perhaps due to indivisibilities such as the need to incur major investment which would require finding outlets for substantial, rather than simply marginal, production volume increases; or it may face regulatory constraints, e.g. on size of market share.[25]

So the crucial insight here (which mirrors Baxter's (2003) argument for DV of assets), is that, *if Revrec is now at its optimal capacity but it still has 'super-profitable' contracts, then if 'relieved' of one of those current contracts immediately after inception Revrec would seek to use the production capacity now freed up to obtain and fulfil another 'replacement' subscription, for which it could again charge £(CF)*. In other words it would end up in the same position as before, still facing production outlays and risk with an expected cost of £(y + RP), but would now have received a further £CF = £(y + RP + ξ) from the 'replacement' subscriber. Again the equivalent amounts at 31 December would be £(y + RP)/2 and £($\frac{CF}{2}$) respectively (here £60 and £66).

[25] E.g. in the case of insurance companies there may be prudential regulatory constraints inhibiting volume expansion through further price cutting. While the precise conditions would need fuller analysis in each case, it is sufficient here to recognize that this will be a common situation.

The entry value ('consideration') rather than FV may therefore be taken as the relevant liability measure for a profitable contract, however profitable that contract may be. In our illustration, this approach gives revenue and profit in each six months as £66 and £9 respectively, with the 31 December balance sheet liability as £66. (Table I, Solution 3 dv(a) shows the accounts for these income statement and balance sheet amounts.) So if Revrec uses RV as the measure of its liability (as 'relief' would enable the signing of a substitute profitable contract), this valuation will be equivalent to conventional deferred revenue throughout and so would lead to balance sheet and income statement figures generally identical to those under the conventional 'revenue recognition/matching' approach, even though we are here adopting primarily an 'asset/liability' framework. RV offers a resolution of the revenue recognition conundrum and is consistent with the Boards' being uncomfortable with adoption of FV's 'exit price' and its forcing of recognition of 'Day 1' profit.

Recognition of inherent goodwill?

Even with this higher liability value given by RV [i.e. £($\frac{CF}{2}$)], Revrec could however still *choose* to report all the profit on inception of the contract if it were allowed to value the relevant 'inherent goodwill', as in Solution 3dv(b) in Table I. Corresponding to Solution 3(b), here the accounting, if it is to follow conventional practice as to the amount of contract revenue recognized and *in addition* take a 'Day 1' profit equal to the NPV of the super-profit, would then also have to require 'amortization' of this initial profit measure as revenues are earned and costs incurred (to avoid double-counting), but clearly this would still not necessitate a wholesale recasting of the income statement from a 'traditional' basis onto a 'changes in valuation' basis of the kind proposed by IASB (2010a) for the generality of insurance contracts.

In our illustration in Table 1, Solution 3dv (b), this approach gives revenue in the first six months as £66, with an additional recognition of net internal goodwill of £6 (effectively adding to profit the present value of the second six months' goodwill) to give a bottom-line profit of £15 then; and revenue in the second six-months again of £66, with additional recognition of the amortization of the remaining goodwill (£6) to leave net profit for that period equal only to the 'normal' profit of £3, representing release from risk. The 31 December balance sheet liability is stated at RV of £66, but there is also the unamortized balance of goodwill among the assets (£6).

Situations where recognition of this internal goodwill might be more readily accepted in practice would be where there is strong market evidence that the profit estimate on the contract is realistic: e.g. where other companies would be prepared to pay an acquisition cost of up to £ξ to take over Revrec's contract (or pay for 'goodwill' of £ξ to take over the company instead) and thereby still earn a 'normal' profit on the business after charging for that acquisition cost/goodwill. Revrec could thereby realise the £ξ immediately on inception of the contract. If it does not wish to actually transfer its business in this way, it could nevertheless 'mark to market' and report the value gain accordingly, which would then have to be recycled as a charge against the subsequent conventional reporting of revenues and profits earned.

In the absence of a market for Revrec's contract, or an actual takeover, it will remain that much harder to estimate the goodwill value in the existing contract as a guide to how much up-front profit on inception it is legitimate to recognize. A result from adopting an 'asset/liability' approach that produces an apparently large profit on inception would therefore need to be carefully tested by asking what market conditions make it reasonable to believe that an enterprise such as Revrec is able to successfully charge premium prices that significantly exceed factor cost, and yield a

return over and above that required by equity shareholders to compensate simply for time and risk-bearing. An extremely safe, conservative view for accounting and auditing purposes might be simply to assume that such situations cannot arise (or at least cannot be sustained for long in a competitive economy) and therefore to argue that costs and/or the risk premium must have been underestimated, and the provisions for one or more of these should be increased until all initial profit is eliminated, so that all profit has to 'emerge' over the life of the contract.

The FASB/IASB's (2010) joint approach to revenue recognition from contracts with customers—like the FASB's (2010) and IASB's (2010a) approach to what IASB label the 'residual margin' in insurance contracts—reflects this caution, and refuses to allow recognition of 'Day 1' profits. But the problem of determining what is a suitable pattern *within* the contract period will still remain. If the initial, more 'aggressive' estimates do turn out to be correct, higher profits will eventually emerge by the end of the contract period than those assumed in fixing the accounting provisions. But when should they be recognized i.e. how much profit can be recognized by 31 December?

What is happening during the contract period is that the value of the super-profit, which is conventionally an unrecognized intangible, is being realized. Should it be recognized that imperfectly competitive conditions are present when the contract is initiated or only 'gradually' as it is proved that actual costs are indeed less than revenues?[26] Can that be adequately proved before the contract is wholly completed?[27]

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[26] Note that an equivalent economic situation arises if Revrec believes its competitive advantage lies, not in being able to charge premium prices for its 'masthead/brand', but in being able to undercut competitors on cost efficiencies.

[27] While the completion date of Revrec's contract may be clear, where there are ongoing obligations (e.g. product warranties or, as in the case of insurance contracts, delays between occurrence and settlement of claims) the enterprise may remain 'on risk' well beyond the initial contract period and the

Furthermore, can the 'risk premium' itself be adequately measured: or is the uncertainty in the estimates so great that 'certainty equivalents' are themselves little more than guesses and all resulting profits (or losses) may better be seen as 'a reward for bearing uncertainty' due to the dynamic nature of a modern economy in which technological change, shifting demand, and management action produce markets that are at best in temporary and unstable equilibria (e.g. Knight, 1921)? This is where FASB (2010) differs from IASB (2010a), as it does not separately recognize the risk premium in an insurance contract but lumps it within an overall 'composite margin'—see Appendix A.

Without some form of reliable external market benchmark any choice of profit recognition pattern is an 'incorrigible allocation' (i.e. logically as good as any other, e.g. Thomas, 1977; Macve, 1997) and wholly conceptual arguments about the nature of assets and liabilities, and about recognition and measurement criteria, seem unlikely to take the debate any further forward. A revision to the standard setters' conceptual framework may acknowledge the problem, but seems unlikely to be able to solve it. It would appear that evidence of how relevant markets are behaving is what is needed to guide accounting in different individual reporting situations—the deeper and more mature the market, the stronger the available evidence and the less need to rely on management estimates or on judgements as to whether or not accounting policies adopted are reasonable given the uncertainties involved.[28]

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risk-bearing element of profit (if that can be separately identified) may only emerge during that run-off period.

[28] This approach is consistent with the Boards' approach (e.g. IASB, 2011) in categorizing FV measurements at different 'levels' related to the availability of market evidence on prices. The paradox here for accounting standard setters is that it is only when values are not already readily obtainable from other reliable market sources that the accounting process may be seen to add incremental information content (e.g. Beaver 1998; Beaver & Demski 1979; Macve, 2010b).

Our initial conclusion therefore stands—that the conventional amount for 'deferred revenue' can represent the RV of a contract's performance liability and that DV/RV reasoning offers a resolution of the conflict between the 'revenue recognition' and 'asset/liability' approaches to stating balance sheet measures and income statement elements. However, unfortunately it is also clear that this resolution of the balance sheet measurement problem is not sufficient in itself to resolve the issues over 'bottom line' profit recognition. Such recognition is a separate issue and essentially requires deciding whether or not to recognize internal goodwill (whether or not identified with particular intangibles such as brands) and thereby the profitability of contracts ahead of their actual full or partial fulfilment (or indeed before their inception).[29] Standard setters clearly need not only to devote attention to clarifying and refining their valuation concepts but also to move beyond regarding asset/liability valuation alone as an adequate tool for resolving accounting conflicts (e.g. FASB 2006: cf. Barth and Landsman 1995; Horton and Macve 2000; Dean *et al*. 2010).

[29] Under certainty all future NPVs on the entity's anticipated business will logically be assigned to the opening accounts for the first period of its activities (Shwayder, 1967). Under uncertainty choice is needed of some 'critical event' that signals sufficient certainty of profit realization (e.g. Johnson, 1970; IASB 2010b, para. 4.48). In current UK life insurance company valuation practice, where the critical event is regarded by the industry as the sale of the policy, the corresponding distinction is between the 'embedded value' (of the existing book of contracts in force, which is accounted for) and the 'appraisal value' (which allows for the expected profitability of future contracts, which is not accounted for but is typically extrapolated from the reported figure for 'profit on new business' (e.g. Horton *et al*., 2007)).

The internal rate of return

For both revenue recognition generally and insurance contracts in particular, FASB and IASB propose to eliminate the recognition of any profit at inception (see Appendix A). One way to do this would be to adjust the estimate of the required rate of return to the 'internal rate of return' ('IRR') or 'effective interest rate' [= r] and thereby eliminate the NPV of the contract. Profit will then emerge as the earning of the IRR on the initial consideration value.

In our simple example with a super-profit of ξ (= £12), and where the market rate of interest is assumed to be zero, the rate of return required on the customer's initial deposit that equates it to the future costs/risk releases to be incurred by Revrec is clearly *negative* [r < 0] (as it only requires Revrec to pay a total of £y (= £114) to supply the customer with magazines, against an initial purchase price received of £CF (= £132), i.e. the sum of the future cash outflows is less than the initial price received).[30] This is much cheaper than borrowing £CF at the market rate of interest (even when that rate is 0%), which would require repayment here (with interest at i = 0% per month) by 12 instalments of £($\frac{CF}{12}$) (= £11) totalling £(CE + ξ) (= £120 + 12 =132). As Revrec thereby gains £(CF - y), which yields the total profit of £(RP + ξ) (= £6 + 12 =18) over the contract's life, it effectively here *earns* interest on borrowing from its customers (it is borrowing at a *negative* interest rate of r % per month) as well as earning interest from investing the customer's advance at i% per month (here =

[30] Where there are no super-profits, i.e. the NPV is zero, the IRR (r) equals the interest rate (i). With super-profits, when i >0 (using variables as defined in Tables I and BI), the rate at which Revrec is borrowing remains negative as it still only requires Revrec to pay a total of £y to supply the customer with magazines, against an initial purchase price received of £$PV_{CF12,i}$ = {$\frac{CF}{12}$ x $\alpha_{12,i}$}. The super-profit that emerges when i > 0 will then be the sum of interest earned (at i) on the assets acquired from the consideration received together with the 'unwind of the discount' on the liability (at r) as shown in Appendix B, Table BI Solution 4.

£0), and thereby earns an overall positive IRR. The profit split by this method as the liability decreases (i.e. when we are assuming that i = 0%) would be £[- $IntEV_{CE,1\text{-}6,r}$ + $\frac{RP}{2}$] to the first 6 months to 31 December and £[- $IntEV_{CE,7\text{-}12,r}$ + $\frac{RP}{2}$] to the second 6 months.[31] This is more conservative than the FV 'asset/liability' method as no 'profit on inception' is recognized. But it is less conservative than the conventional 'deferred revenue' method as here more overall return is earned in the first six months, while the balance of the outstanding customer liability at 31 December is smaller.[32] In our numerical example with super-profit of £12, when the interest rate = 0%, the resulting IRR (r) on the liability is -1.458% per month (approximately -16% per annum). At this rate, revenue for the first six months is £66 (as before) and profit is £11.86, with the remaining liability at 31 December at £63.14. The remaining profit of £6.14 correspondingly emerges in the second six months, as shown in solution 4 in Table I.

However, the objection to using the IRR is that it is no more than a 'fix' to avoid any recognition of profit on inception. In addition it produces balance sheet amounts at 31 December that are hard to understand. The 'liability' balance at this date (calculated using the IRR) will be £$EV_{CE6,r}$, being neither the 'deferred revenue' of £$PV_{CF6,i}$ (which we have argued to be the RV), nor the risk-adjusted liability for future costs of £$PV_{CE6,i}$.[33] It therefore produces figures that cannot be interpreted

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[31] As r is negative, to find r with the pattern in our example here (i.e. that starts with the initial inflow) requires equating the 'end' (or terminal) values (EV in the Tables). [- $IntEV_{CE,1\text{-}6,r}$] is then a positive amount of income. Where i > 0, the income also includes interest on the initial consideration received, i.e. [$IntPV_{CF,1\text{-}6,i}$].

[32] The amounts of asset and liability in the beginning are both equal to £$PV_{CF12,i}$. The liability initially also equals £$EV_{CE12,r}$: thereafter asset and liability amounts diverge, with the liability only equal to £$EV_{CEn,r}$ (where *n* is the number of remaining months in the contract). See Tables I and BI for definition of the other variables.

[33] Indeed, given that Revrec starts with no net assets, it may be hard to explain how it earns 'a rate of return'. Moreover, in the general case, where companies also hold productive assets and inventories, or have incurred costs in advance of the contract, use of the IRR produces values for these (at accounting

either in the way that current GAAP figures can, or in any way that 'conceptual framework' measurement of liabilities might be understood (see also Draper *et al*. 1993). Its main advantage is that the showing of an earned rate of return consistently higher than the cost of capital is a widely understood way of indicating that super-profits are being made. But it is just one of many possible ways of spreading the total expected contract income between the two accounting periods and is not demonstrably superior on any conceptual grounds.[34]

IV. CHANGING PRICES AND OTHER ASSUMPTION CHANGES

Like IASB (2005), which only deals with measurement at initial recognition, we do not analyse fully here the effect of changing prices. However, we note that the ASB's discussion paper on *Revenue Recognition* suggested that often an appropriate technique when 'dealing with incomplete contractual performance is to assess the value of benefit that has not yet accrued to a customer' (ASB 2001, para. 3.22), which is consistent with the FASB/IASB (2010) proposals. However, inconsistently with RV reasoning, it argues that: 'Once again, when making this assessment, it is important that it is based on prices and circumstances that would have prevailed at the time the contract was originally formed; otherwise, *changed prices may distort the allocation of overall revenue from the contract*' (para. 3.23—emphasis added).

If at the year-end conditions have changed, such that Revrec can now charge more for its services, while costs have not changed, then the conventional 'historical cost'

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dates after initial recognition) which simply represent present values of future cash flows discounted at r and so do not represent DVs and are inconsistent with any available market values (Baxter 1975). Insurance companies have argued for continuing the current convention to account for their contract acquisition costs as an asset—'deferred acquisition costs' (DAC). Our analysis supports this insofar as the DAC may represent DV at initial recognition (as 'deprival' would require spending the same amount again). But spreading on the basis of IRR over the contract life would destroy this relationship of balance sheet amounts to DV at subsequent accounting dates.

[34] A similar objection applies to other proposed 'economic' allocation methods such as 'Earned Economic Income' (Peasnell, 1995a; 1995b: cf. Grinyer, 2000).

revenue recognition approach will still show the originally expected amounts. But RV will rise because avoidance of the current obligation would allow entry into a new, replacement contract at the new price. Should revenue also be raised—or should some other income statement item capture the price revision?

There is clearly an 'opportunity loss' from being saddled with the current contract (and equivalently an 'opportunity gain' if prices have fallen). But whether the accounts should record any loss or gain as part of 'current earnings' opens up the same arguments as those debated frequently in the past (e.g. Edwards and Bell, 1961; Baxter, 1975; Whittington, 2008) over whether 'holding' gains and losses from changes in replacement costs of assets should be recognized, and if so whether this should be in current earnings or presented separately (e.g. as reported currently under IFRS in 'Other Comprehensive Income (OCI)') and, if the latter, whether they should then be 'recycled' into current earnings in subsequent periods to offset the higher or lower cost (here revenue) amounts then flowing through.[35] It may be noted however that not recognizing such revaluation gains and losses, as recommended by ASB (2001), has the same overall net effect on earnings as initial recognition outside earnings coupled with subsequent recycling into earnings.

Where the higher price now being charged to new customers also reflects the opportunity for Revrec to earn a higher margin of profit in the future, it would seem paradoxical to show a loss now due to restating the current liability at the new higher RV amount. Clearly a satisfactory overall solution also requires recognition of the related intangible for the NPV (as discussed above), which should also be restated

[35] Clearly if Revrec charges a higher initial annual magazine subscription/insurance premium for providing this guarantee against any price rise, the embedded option premium would need to be matched against the recognition of any such loss or gain from price changes. (On options in DV/RV see Stark, 1997.)

upwards to reflect the additional profit the company could earn at the new price. Once again, not repricing the liability is tantamount to the implicit recognition of this gain.

The repricing issue therefore emphasises our previous argument that profit recognition (and thereby performance measurement) needs to be considered independently of simply resolving asset and liability measurement issues, and this may also change revenue recognition.

More generally we have assumed in the discussion so far that events turn out as planned. In practice, however actual outcomes will diverge in various ways from expected outcomes and estimates of remaining outcomes will be revised. If the revisions to outcomes/estimates only arise in the second half of our contract year, then the profits reported for the first half year will remain identical. Clearly if the revisions are adverse (e.g. costs are now expected to be higher) then the accounts will now show smaller profits, or indeed losses, in the second half-year and overall (after charging for interest and risk-bearing). Equally clearly, the more profit that has been recognized in the first half of the year, the greater the loss (or at least profit fall) that will have to be reported in the second half-year. But provided a proper provision for risk is made initially, this possibility would not appear of itself to justify changing the pattern that is chosen *ex ante*.

Revisions to experience and future estimates may also arise before the accounts at 31 December are finalised. If the revisions are favourable, this will create (or further increase) NPVs; if unfavourable this will reduce or even eliminate NPVs; and if they become sufficiently unfavourable provision will be needed for what is now an onerous contract (as conventional accounting recognizes, at least when undiscounted future cash flows are expected to be negative or insufficient to recover existing stated asset amounts). The same difficulties as previously discussed over deciding when to

recognize any changes in positive NPV will arise, but our analysis has suggested that *all* changes in asset and liability values, *including* internal goodwill, are needed to give a full picture (as e.g. Edey, 1963).

The Boards are taking a different approach but without any clear conceptual justification. With regard to revenue recognition generally, the joint 2010 ED does not propose any departure from spreading the original contract transaction price (except where the contract becomes onerous); and in respect of insurance contracts, while other elements constituting the liability amount are to be re-estimated, the Boards propose that the residual margin (IASB) /composite margin (FASB) in their initial liability estimates continue to be released into earnings on the original pattern (see Appendix A).

V. PROFIT PATTERNS

Ohlson (2006), now supported by AAA (2009), argues that investors like to have a natural starting point in the income statement as they try to forecast subsequent periods' sustainable earnings.[36] The concept of sustainable earnings is consistent with Hicks's (1946) 'No. II Income' which can be described, in the case of a firm, as the maximum amount of periodic dividend it can pay to the owners of the equity, into infinity. Ohlson argues that reporting such maintainable earnings would require that assets and liabilities be derived from income and not *vice versa* (as in his formulation there of an 'accounting principle' for deriving a period's closing net operating assets).

Only when interest rates are expected to, and do, remain constant does Hicks's 'No. II Income' coincide with Hicks's (1946) 'No. I Income' i.e. the maximum dividend an entity can distribute each period while leaving its capital value intact (as

[36] We use here the terms sustainable, maintainable and persistent interchangeably.

in Ohlson's 'steady state' formulation). The 'asset/liability' approach adopted by FASB and IASB measures assets and liabilities and thereby defines income as changes in these and so adopts a *structurally similar* approach to Hicks's 'No. I' concept (cf. Bromwich *et al*., 2010). Under the assumption of no expected change in the interest rate, the approach to income measurement adopted by standard setters could therefore still produce persistent earnings. However, as illustrated in our argument above, in conditions of imperfect competition an exit value measurement basis such as FV cannot produce a maintainable earnings figure, as it normally forces recognition of the total super-profit on 'Day 1' (as in Solution 3(b) in Table I).[37]

So in periods where contracts are initiated FV profits will be much higher compared to periods where profits are only made from the carrying out of existing contracts. FV measurements, as currently defined, cannot therefore of themselves provide bottom-line income numbers of the kind that Ohlson argues are directly useful to analysts, as the resulting profit pattern will exhibit greater volatility[38] compared to the profit pattern that would be created by DV/RV measurements under the reporting approach illustrated in Table I Solution 3dv(a). Analysts may also thereby be hindered from understanding the ongoing processes by which profitable firms add value during their performance activities through turning inputs (at entry prices) into outputs (at exit prices), i.e. their 'business model' (see e.g. Penman, 2007, 2011; Singleton-Green, 2010, for further discussion).

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[37] To overcome this problem would require the recognition and capitalization of all future super-profits, on which a sustainable income would then be reported equal to 'interest on capital' plus reward for risk bearing.

[38] Except when the company is able to write an equal number of similarly profitable contracts in each accounting period. As illustrated under Table I Solution 3dv(b), if internal goodwill is capitalised, a similar problem would arise even if DV/RV is adopted as the basis of measurement. The danger lies in any failure by analysts (or other users) to understand the true nature of these 'Day 1' super-profits and their relationship to future earnings. This implies that full disclosure of the significance of this profit element is needed, in the way that UK life insurers assist analysts in their supplementary MCEV reporting by highlighting the 'profit on new business', which is conceptually equivalent to the NPV in new contracts written (see Horton *et al*. 2007 for further discussion).

Whatever pattern of profit reporting is adopted, under whatever system for reporting asset and liability values, it is clear that disclosure of the assumptions being made about future growth and profitability is also needed if a picture that can be fully interpreted is to be given (e.g. Bromwich *et al*. 2010; Bromwich 2010).

VI. CONCLUSION

Will the 'asset/liability' approach produce reported earnings patterns of better 'quality' than the 'revenue recognition' approach? A conflict most generally will appear wherever enterprises expect to earn super-profits, i.e. profits that cannot be identified as factor costs in the way that items such as 'interest' and 'reward for risk bearing' may. Moreover, in many circumstances, even these elements may not be separately estimable with any reliability from market benchmarks. In other cases, while companies may have invested in building up the necessary intangibles that enable them to achieve apparent super-profits, current GAAP accounting for these intangibles fails to properly match investment and return.

DV reasoning (in the form of RV) does offer a reconciliation of the 'asset/liability' approach and the 'revenue recognition' approach to the measurement of liabilities. We have argued that the exit price liability measurement approach of FV (which also ignores transaction costs) generally fails the tests of both decision-relevance and economic logic. Moreover, RV does not force the recognition of 'Day 1' profit on inception of a contract, which has proved to be a major stumbling block in the Boards' discussions of revenue recognition and insurance contracts. Our analysis provides conceptual clarification that supports the Boards' being 'uncomfortable' about the implications of adopting FV here, and their focussing instead on the consideration associated with the transaction. Moreover, our accounting illustrations

in Table I show that adopting RV allows reflection of current values while obviating the need for a wholesale recasting of the presentation of the income statement (of the kind proposed in IASB 2010a).

However, we have also argued that this balance sheet/income statement reconciliation is still insufficient in itself to determine the issue of when profits should be recognized: that requires specific consideration of how performance should be measured, and not just of how it should be presented. It is therefore unfortunate that it is only the latter issue which became the focus of the Boards' joint project on 'performance reporting' (downgraded to 'financial statement presentation', cf. Barker, 2004).

Given that the conflict with current GAAP pervades all kinds of business it would appear that the Boards will need to consider the whole issue of accounting for intangibles, and indeed the overall adequacy of a model that identifies 'comprehensive income' solely in terms of changes in recognized assets and liabilities (e.g. Macve 1997; Bromwich *et al*. 2010), before they are likely to make any progress in going beyond 'revenue recognition' issues to the appropriate measurement and presentation of the corresponding reported performance.

Table I Recrev Corporation: An Example

Numerical illustration (assuming interest rate = 0%)

Dynamics of solution 1: *CE = y = £114; TP = y - y = £0*

Dynamics of solution 2: *CE = y + RP = £114 + 6 = 120; TP = RP = CE - y =£6*

Dynamics of solution 3, 4: *CF = CE + ξ = y + RP + ξ = £114 + 6 +12 = 132*; *TP = RP + ξ = CF - y =£18*

Dynamics of solution 4: IRR (see Table BI) is here calculated to be -1.458% per month (-15.941% per annum)

Income Statement year 1 (six months)

[Total profit on contract] Solution #:		Magazine revenue	Income other (NPV/recycling)	Income Other (Unwind of r)	Total Income	Costs magazine	Costs amortiz'n of NPV/G'will	Total cost	Profit (Jul-Dec) Year 1	Profit (Jan-Jun) Year 2
		£	£	£	£	£	£	£	£	£
[£0] 1		57.00	-	-	57.00	57.00	-	57.00	0	0
[£RP] 2		60.00	-	-	60.00	57.00	-	57.00	3.00	3.00
[£(RP+ξ)] 3	either a)	66.00	-	-	66.00	57.00	-	57.00	9.00	9.00
	or b)	66.00	6.00	-	72.00	57.00	-	57.00	15.00	3.00
	or dv a)	66.00	-	-	66.00	57.00	-	57.00	9.00	9.00
	or dv b)	66.00	12.00	-	78.00	57.00	6.00	63.00	15.00	3.00
[£(RP+ξ)] 4		66.00	-6.00	8.86	68.86	57.00	-	57.00	11.86	6.14

Balance Sheet 31 December Year 1

Solution #:		Assets Cash etc.	Other NPV/G'will	**Total Assets**	Liabilities contract	Equity (undistrib'd profit)	[Assumes half total profit distributed to date =]
		£	£	£	£	£	£
1		57.00	-	57.00	57.00	-	0
2		60.00	-	60.00	60.00	-	3.00
3	either a)	66.00	-	66.00	66.00	-	9.00
	or b)	66.00	-	66.00	60.00	6.00	9.00
	or dv a)	66.00	-	66.00	66.00	-	9.00
	or dv b)	66.00	6.00	72.00	66.00	6.00	9.00
4		66.00	-	66.00	63.14	2.86	9.00

Variables are defined in the text (and extended in Table BI). Solution 1 assumes no risk. Solution 2 assumes risk premium RP. Solution 3 assumes also super-profit ξ. Solution 4 is based on IRR. The solutions are equivalent, *mutatis mutandis*, for the case of the insurer (Insrec Corporation), where 'magazine revenue' is 'premium income' (see Appendix A).

APPENDIX A: Insurance Contracts

The IASB's project on insurance began with the IASC in 1997 and has remained extremely controversial. FASB later joined the project and, although IASB has issued an ED (2010a), the two Boards have not yet reached full agreement. However, as we have argued here, insurance contracts, far from requiring some special treatment, also fit the general case of RV recognition, which will be equivalent to the conventional 'deferred revenue'/'unearned premium' (at least until prices change). Assume Insrec Corp. issues one-year insurance policies on similar terms to Revrec Corp., so that for a typical policy Insrec receives the year's premium in advance on 1 July, and expects to pay claims and other related costs of £$\frac{y}{12}$ at the end of each month,[39] while requiring a risk premium for the uncertainty inherent in its estimates of £$\frac{RP}{12}$ per month. Clearly a one-year policy where the policyholder pays in advance is structurally similar to the general case that we have been considering.

Acquisition costs are normally paid by insurance companies and, under conventional GAAP, have traditionally been deferred and amortized against premium income.[40] 'Unearned premiums' will conventionally be carried as a liability in Insrec's balance sheet at the 31 December accounting year-end (in the simplest case through simple time-apportionment between accounting periods, or more sophisticatedly by taking account of any variation in the pattern of insurance risk across the policy year) but clearly, in a situation where Insrec's product is fully competitively priced, they will only represent no more than Insrec's liability to pay the remaining expected claims and other related costs, together with provision for risk-bearing. However, as we have already seen in Revrec's case, if Insrec is able to charge a premium which more than covers all costs that have been or are expected to be incurred, its provision for 'unearned premiums' will exceed its estimates for claims and related costs still to be recognized plus the risk premium. Insrec will have an NPV that could be recognized as 'profit on inception of the contract' under the asset/liability approach.

So we may legitimately equate Insrec's insurance policy with other commercial arrangements with customers, such as Revrec's magazine contract.

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[39] Strictly one cannot discuss the liability on an individual policy as insurance relies on the pooling of risks across substantial populations of policyholders: but we can still scale down the resulting statistical expectations in considering our simple 'typical' policy example, as argued by IASB (2010a).

[40] Examples and solutions extended to include acquisition costs, and showing that the traditional accounting approaches can similarly be reconciled with a RV valuation of the policy liabilities, are available on request from the authors.

The 'current exit value' approach favoured by IASB in its Discussion Paper (2007b)—which IASB at the time could not distinguish from FV—would generally only produce the same result as practice under traditional UK/US/international GAAP if insurers face perfectly competitive markets—or are able to treat as policy acquisition costs all investment in brands, reputation etc. that has given them any competitive advantage. In the real world, substituting FV represents an implicit decision to accelerate the pattern to be adopted for reported realization of the insurer's 'brand value' and other intangibles. FASB (1999, paras. 166-7) smuggled in the same implicit decision on revenue and profit recognition.

In their exposure of the IASB's (2010a) insurance ED the Boards decided to go back to the more traditional view and propose 'plugging' the measure of the liability with a 'residual margin' (IASB), or 'composite margin' (FASB), in order to eliminate any 'Day 1' profit recognition and spread the profit on a systematic basis over the life of the contract.[41] In doing so they have not been able to explain conceptually how the resulting balance sheet liability at subsequent dates represents a current value. We have argued here that our RV approach fulfils this requirement while being consistent with the profit measurement approach espoused by the Boards.

However, for long-term insurance contracts both Boards want the presentation of the income statement to depart from the traditional 'premiums less claims and expenses' approach and to report instead the margins being earned and variations in these due to experience gains and losses and revisions of assumptions (with the premiums, claims etc. relegated to note disclosures). But our analysis here can readily be extended to long-term ('life') insurance contracts. In the case of 'single premium' contracts we merely have to extend the period over which the contract is in force with corresponding liability measurements being required at each accounting date. Where premiums are paid annually under 'level term' contracts, policyholders initially pay more than the amount required to cover each year's risk, and in the later stages of the policy pay less than this, which provides them with an economic incentive (in addition to maintaining guaranteed insurability) to continue the contract, and gives rise to a similar accounting problem of how to recognize 'deferred revenue'. So the timing of payment is not crucial to the argument. Our argument therefore supports maintaining the traditional form of income statement presentation, albeit with some additional elements as in our examples in

[41] The Boards differ over how far interest on these margins should be recognised (FASB, 2010).

Tables I and BI, together with elements for changes in prices and assumptions as discussed in Section IV.

APPENDIX B: Accounting for interest effects.

Conventional microeconomics recognizes that capital must earn its required rate of return and this is as much a cost of production as materials, labour, use of equipment, etc. Capital is rewarded both for time between investment and return ('interest') and for risk bearing. Our simple numerical examples in Table I assume an interest rate of zero. Here we show how this will change if the interest rate is greater than 0, based on Solution 1 (i.e. not allowing for risk), for consistency labelled Solution 1 in Table BI.[42]

Solution 1 (now with interest rate > 0)

Assume interest is i% per month. As production etc. costs are £$\frac{y}{12}$ per issue, and a year's subscription covers 12 issues, therefore the competitive price for a year's subscription paid in advance is now the amount equivalent in present value to 12 future monthly receipts of £$\frac{y}{12}$ each, namely £{$PV_{y12,i} = \frac{y}{12}$ x $[\frac{1}{i} - \frac{1}{i \times (1+i)^{12}}] = \frac{y}{12}$ x $\alpha_{12,i}$}, giving a 'discount' of £$D_{y,12}$ = (y - $PV_{y12,i}$) to the customer for paying annually instead of individually for each instalment as it is delivered. Assuming the customer has therefore initially paid £$PV_{y12,i}$ on July 1st, then at 31 December the conventional accounting allocation of the revenue under present-day GAAP would normally be half to each 6-month period, i.e. £$\frac{PV_{y12,i}}{2}$, while both the cost to date and the 'liability to produce and deliver 6 more issues' appear *prima facie* to be £$\frac{y}{2}$, indicating a loss of £$D_{y,12}$ (i.e. making provision now for the loss to come in the second six months). So we need to recognize the interest effect in the accounting and then there will be no conflict between the 'revenue recognition' and the 'asset/liability' approach. Earned revenue to 31 December in total is the price of the first six instalments, plus interest on the

[42] That Table also shows how the accounting in the other solutions in Table I would correspondingly be adjusted. The full workings for Table B1, and also for a number of additional scenarios, are available from the authors on request. (For simplicity of illustration we assume immediate distribution of any monthly profits to avoid further interest effects.)

assets held to date—which is £(IntPV$_{y,1\text{-}6,i} = \sum_{1}^{6} i \times PVy$)—i.e. earned revenue totals £$\frac{y}{2}$ + £IntPV$_{y,1\text{-}6,i}$. Expenditure is the cost of the first six instalments plus interest (i.e. 'unwind of the discount' on the liability) to date, i.e. £($\frac{y}{2}$ + £IntPV$_{y,1\text{-}6,i}$), which again gives the standard 'competitive' result of an overall net income of zero. As all the finance has been provided by the customer, and there is no risk, the equity owners have contributed nothing and have correspondingly earned nothing. The year-end liability is the remaining obligation to incur the second six months costs of £$\frac{y}{12}$ per month, which is now not simply £$\frac{y}{2}$ but the present value £PV$_{y6,i}$ = $\frac{y}{12}$ x $\alpha_{6,,i}$

With our illustrative numbers, where production etc. costs are £9.50 per month, and assuming an interest rate of 1% per month,[43] the customer's discounted up-front payment is £9.50 x $\alpha_{12,0.01}$ = £106.92, which is the initial RV. Interest accrues monthly on this gradually reducing initial liability, giving a total 'unwind of discount' as an extra cost of £5.14 in the first six months. In the first six months revenue from the magazine is £57 (the same as in Table I Solution 1) and by 31 December the liability is down to £55.06 (as compared to £57 in Table I Solution 1), comprising a provision for the present value of the expected remaining production costs to be incurred, or equivalently the present value of the second six months' deferred revenue. Revrec will have had to call off from the customer's initial deposit an amount equal to the production cost of £9.50 as each of the first six monthly issues was produced; but they will have earned interest on the gradually decreasing balance of that deposit, also amounting to £5.14.[44] So the first six months' net profit is zero. If everything goes to plan in the second six months, the pattern will be repeated (but with the amounts of offsetting interest both lower) and Revrec will earn a net profit of zero overall for the financial year**.**

[43] We assume competitive capital markets such that borrowing and lending are available on the same terms to all participants. 1% per month, with monthly rests, is equivalent to $((1.01)^{12} - 1)*100$ % per annum, i.e. 12.6825% per annum. An annuity of 12 instalments of £9.50 per month at 12.6825% p.a. has a present value of £9.50 * 11.25508 = £106.92326, say £107.

[44] The bookkeeping is [opening liability £106.92 + unwind of discount £5.14 = £112.06, less reduction equal to revenues for 6 monthly magazine issues £57 = remaining liability £55.06]. Equivalently for the asset (the customer's deposit) as the costs are spent. Full workings for the bookkeeping for arithmetical illustrations of all the situations covered in Table BI, and also for a number of additional scenarios, are available from the authors on request.

So including interest brings no conflict between the 'asset/liability' and 'revenue recognition' approaches and, as Table B1 illustrates, this also holds for all the other scenarios considered in the main paper.

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Insert Table BI about here

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This analysis is consistent with the IASB's (2010a) approach of proposing that interest be accrued on all elements of the provision for insurance contracts, including the residual margin in insurance contracts, as against FASB's (2010) rejection of this—see Appendix A.

Table BI: Recrev Corporation: example as in Table I but with interest rate >0%

Income Statement year 1 (six months)

[Total profit on contract] Solution #:		Magazine revenue	Income other (NPV/ recycling)	Income other (Unwind of discount)	Costs	Costs amortiz'n of NPV/G'will/ DAC	Costs other ('interest'/ unwind of discount')	Profit (Jul-Dec) Year 1	Profit (Jan-Jun) Year 2
		£	£	£	£	£	£	£	£
[£0] 1		y/2	-	$IntPVy_{,1-6,i}$	y/2	-	$IntPV_{y,1-6,i}$	0	0
[£RP] 2		CE/2	-	$IntPV_{CE,1-6,i}$	y/2	-	$IntPV_{CE,1-6,i}$	RP/2	RP/2
[£(RP+ξ)] 3	Either a)	CF/2	-	$IntPV_{CF,1-6,i}$	y/2	-	$IntPV_{CF,1-6,i}$	(RP+ξ)/2	(RP+ξ)/2
	or b)	CF/2	$PV_{ξ12,i}$ -(ξ/2)	$IntPV_{CF,1-6,i}$	y/2	-	$IntPV_{CE,1-6,i}$	$PV_{ξ12,i}$ +(RP/2)+$IntPV_{ξ,1-6,i}$	(RP/2)+$IntPV_{ξ,7-12,i}$
	or dv a)	CF/2	-	$IntPV_{CF,1-6,i}$	y/2	-	$IntPV_{CF,1-6,i}$	(RP+ξ)/2	(RP+ξ)/2
	or dv b)	CF/2	$PV_{ξ12,i}$	$IntPV_{CF,1-6,i}$ + $IntPV_{ξ,1-6,i}$	y/2	ξ/2	$IntPV_{CF,1-6,i}$	$PV_{ξ12}$ +$IntPV_{ξ,1-6,i}$+(RP/2)	(RP/2)+$IntPV_{ξ,7-12,i}$
[£(RP+ξ)] 4		CF/2	-ξ/2	$IntPV_{CF,1-6,i}$ - $IntEV_{CE,1-6,r}$	y/2	-	-	(RP/2)+$IntPV_{CF,1-6,i}$ - $IntEV_{CE,1-6,r}$	(RP/2)+$IntPV_{CF,7-12,i}$ - $IntEV_{CE,7-12,r}$

Balance Sheet 31 December Year 1

Solution #:		Assets Cash	Other DAC/G'will	Total Assets	Liabilities contract	Equity (undistrib'd profit)	[Assumes half total profit distributed to date =]
		£	£	£	£	£	£
1		$PV_{y6,i}$	-	$PV_{y6,i}$	$PV_{y6,i}$	-	0
2		$PV_{CE6,i}$	-	$PV_{CE6,i}$	$PV_{CE6,i}$	-	RP/2
3	either a)	$PV_{CF6,i}$	-	$PV_{CF6,i}$	$PV_{CF6,i}$	-	(RP+ξ)/2
	or b)	$PV_{CF6,i}$	-	$PV_{CF6,i}$	$PV_{CE6,i}$	$PV_{ξ6,i}$	(RP+ξ)/2
	or dv a)	$PV_{CF6,i}$	-	$PV_{CF6,i}$	$PV_{CF6,i}$	-	(RP+ξ)/2
	or dv b)	$PV_{CF6,i}$	$PV_{ξ6,i}$	$PV_{CF6,i}$ + $PV_{ξ6,i}$	$PV_{CF6,i}$	$PV_{ξ6,i}$	(RP+ξ)/2
4		$PV_{CF6,i}$	-	$PV_{CF6,i}$	$EV_{CE6,r}$	$PV_{CF6,i}$ - $EV_{CE6,r}$	(RP+ξ)/2

Solution 1 assumes interest rate i > 0, but no risk. Solution 2 assumes both risk and interest rate. > 0. Solution 3 assumes also super-profit ξ. Solution 4 reflects IRR = r, where ξ > 0, such that $PV_{CF12,i} = EV_{CE,12,r}$. As r here is negative so at 31 December $EV_{CE6,r} > PV_{CE6,i}$ and over the contract total super-profit ξ = $IntPV_{CF,1-12,i}$ - $IntEV_{CE,1-12,r}$. The solutions are equivalent, *mutatis mutandis*, for the case of the insurer ('Insrec Corporation'), where 'magazine revenue' is 'premium income'. Variables (in addition to those defined in Table I)—$\alpha_{n,i}$: annuity factor for *n* periods at interest rate *i*; $PV_{x,n,i}$: Present value of annuity with *n* cash flows *x*, discounted at interest rate *i*; $IntPV_{x,\gamma-\beta,i}$: Sum of interest charged on the present value of *x* from time point β until γ at interest rate *i*.

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The Technical Director

International Public Sector Accounting Standards Board

International Federation of Accountants

277 Wellington Street West, 6th Floor

Toronto, Ontario M5V 3H2 Canada

Per e-mail stepheniefox@ifac.org

10 June 2011

Dear Stephenie,

COMMENTS ON PHASE I, II AND III OF THE IPSASB'S CONCEPTUAL FRAMEWORK PROJECT

We welcome the opportunity to provide comments on Phases I, II and III of the IPSASB's conceptual framework project. Overall, we are supportive of the project as we believe it makes significant strides in strengthening transparency and accountability in public sector financial reporting.

Enclosed are our comments on:

- The Exposure Draft on Phase I – *Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: Role, Authority, and Scope; Objectives and Users; Qualitative Characteristics; and Reporting Entity*.
- The Consultation Paper on Phase II – *Elements and Recognition.*
- The Consultation Paper on Phase III - *Measurement of Assets and Liabilities*.

This comment letter has been prepared by the Secretariat and does not necessarily reflect the views of the ASB Board. In formulating the comments outlined in this letter, the Secretariat has consulted a variety of stakeholders in the South African public sector, including auditors, preparers, professional bodies and academia.

As acknowledged in the various documents issued for comment, it may be necessary for the IPSASB to issue a complete Framework for comment once the various phases are complete. Based on the final outcome of the Framework, the views expressed in this letter may be subject to change.

Just as financial statements on their own may not provide sufficient information for accountability and decision-making under the accrual basis of accounting, the statement of receipts and revenues along with disclosures may not provide sufficient information under the cash basis of accounting. We therefore recommend that the IPSASB consider developing a separate Framework for the cash basis of accounting as this would be useful to supplement existing information either required or disclosed under the Cash Basis IPSAS.

Board Members: Ms K Bromfield, Mr R Cottrell (Chairperson), Mr V Jack, Ms CJ Kujenga, Mr K Kumar,
Mr T Makwetu, Mr F Nomvalo, Mr G Paul, Mr I Sehoole, Mr V Smith
Chief Executive Officer: Ms E Swart

Please feel free to contact me should you require clarification on any of our comments.

Yours sincerely



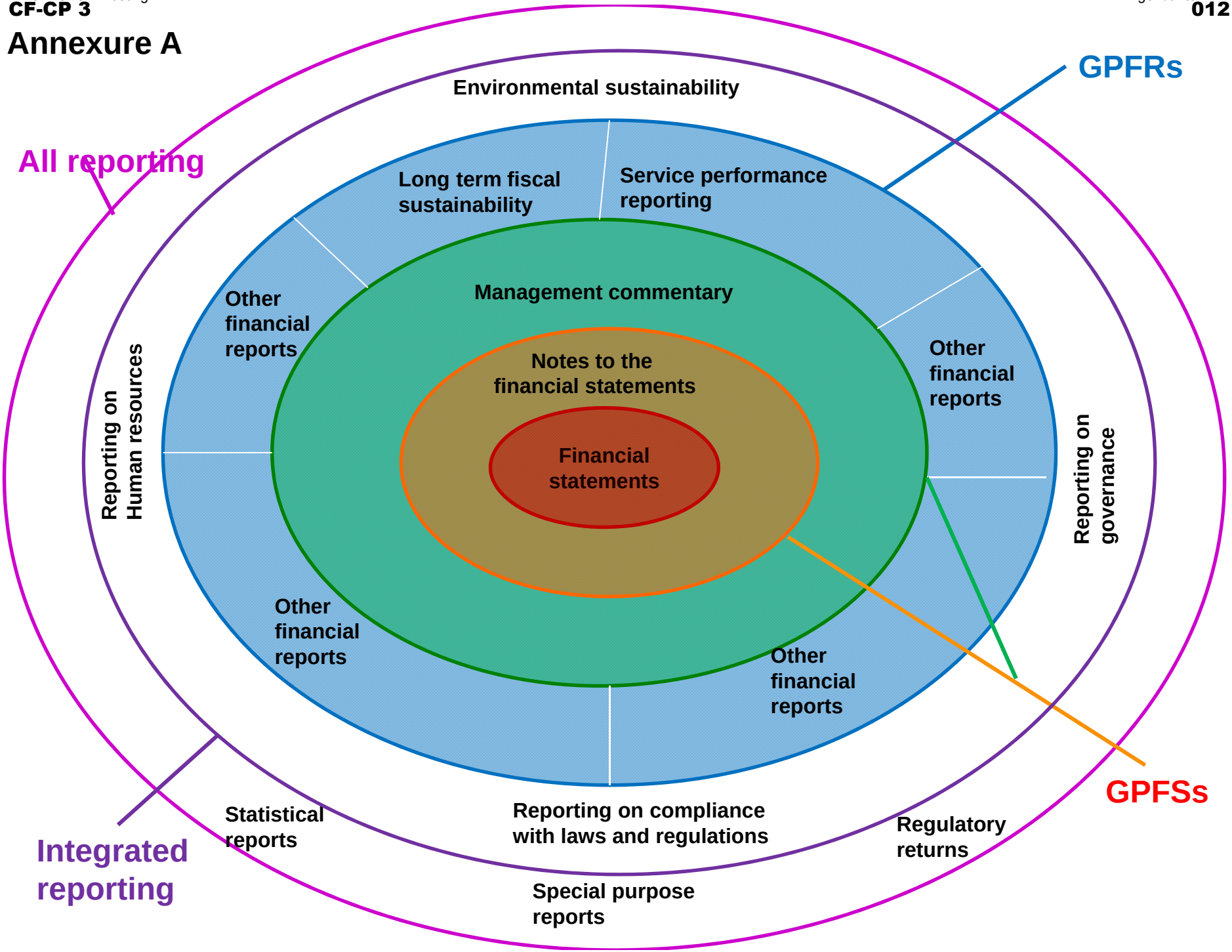
Erna Swart

Chief Executive Officer

Phase III - *Measurement of Assets and Liabilities*		
	Question 1	**Should the role of the Framework be to identify factors that are relevant in selecting a measurement basis for particular assets and liabilities in specific circumstances, rather than specify a single measurement basis or combination of bases?**
		The Framework should outline the measurement bases that can be applied in the development of IPSASs. The measurement basis used should reflect the nature of the asset (or liability) and management intention for holding a particular asset (or assuming a particular liability), while having regard for the qualitative characteristics. Consequently, we are of the view that a single measurement cannot be prescribed in the Framework.
	Question 2	**If, in your view the Framework should specify a measurement basis or combination of bases (or approach in the case of deprival value), which should that be?** ***Single measurement bases*** **(a) Historical cost.** **(b) Market value.** **(c) Replacement cost.** ***Combination of bases/approach*** **(d) Deprival value.** **(e) Historical cost and market value.** **(f) Replacement cost and market value.** **(g) Historical cost, replacement cost and market value.** ***Others*** **(h) Another measurement basis or combination of bases/approach**
		Historical cost, market value and replacement cost are all appropriate within a specific context. For example, historical cost is favoured for its simplicity, while replacement cost and market values may be favoured in determining the current cost of the goods and services provided and may be useful in tariff setting. We would therefore support including all three these bases in the Framework. We would however suggest that fair value be considered as an additional "measurement model" which can be used in formulating measurement requirements at a standards-level. While the intention of "fair value" may be to depict a market-based exit value, there is a hierarchy of measurement methods that can be used to determine this value, i.e. a price in an observable market, a price determined using inputs that may not be directly observable, and a value that is entity specific based on value-in-use or replacement cost. Just as deprival value is a method for selecting a basis that reflect the amount that would just compensate the entity for the loss of an asset, fair value is a hierarchy that is applied to measurement bases that best reflect a market-based exit value for an asset.
	Question 3	**The Consultation Paper discusses the following measurement bases: historical cost. Market value, and replacement cost. It also discusses the deprival value concept which does not describe a single measurement basis, but rather a means by which a basis may be selected that is relevant to the circumstances. Value in use and net selling price are discussed in the context of the deprival value model.** **In your view, is this discussion complete, balanced and fair? If not, please indicate**

		what in your view is missing or in what respects you consider the discussion does not draw out the strengths and weaknesses of the various bases (or approach in the case of deprival value).
		We agree with the discussion as outlined in the paper. We do however have reservations about the application of deprival value. In particular, the deprival value seems to only indicate a choice between valuation approaches that represent a 'current' value (replacement cost, value in use and net selling price all imply the use of a current value at the reporting date). It is unclear how, or if, deprival value considers historical cost. As historical cost may be favoured because of its simplicity, it would be important to develop a model that considers historical cost in selecting an appropriate measurement basis. Also see the comments to specific matter for comment 2 above.
	Question 4	**In your view, should:** **(a) The effect of an entity's own credit risk be reflected in the measurement of liabilities at initial recognition; and** (b) **The effect of changes in own credit risk be reflected when liabilities are subsequently remeasured?**
		How an entity determines fair value, either assets or liabilities, is an issue that should be dealt with in formulating the measurement requirements for particular assets and liabilities. We are of the view that how fair value is determined is an issue that should be considered at a standards-level rather than at a conceptual level.
	Question 5	**In your view, where assets are not restricted in use and therefore may be sold for an alternative use, should the measurement reported in the statement of financial position reflect:** **(a) Only the service potential relating to the existing use; or** **(b) Include the incremental value relating to its possible sale for an alternative use.**
		As the public sector exists to provide goods and services that are in the public interest, often at free or subsidised rates, it can be argued that an alternative use exists for many, if not all, assets in the public sector. An alternative use may reflect activities that are not in the public interest, or may reflect the provision of goods or services on a commercial basis. As the intention of holding assets in the public sector is to represent the resources available to an entity to meet its mandate/service delivery obligations, the measurement of assets on the basis of their alternative use would not result in the faithful representation of the financial position. We would therefore not support the measurement of assets considering their alternative uses; the measurement basis should reflect the service potential related to the existing use of the asset.

Annexure A


All reporting
GPFRs
Environmental sustainability
Long term fiscal sustainability
Service performance reporting
Other financial reports
Management commentary
Notes to the financial statements
Financial statements
Other financial reports
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Statistical reports
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Regulatory returns
Special purpose reports

Schweizerisches Rechnungslegungsgremium für den öffentlichen Sektor (SRS)
Conseil suisse de présentation des comptes publics (CSPCP)
Commissione svizzera per la presentazione della contabilità pubblica (CSPCP)
Swiss Public Sector Financial Reporting Advisory Committee

Stephenie Fox
Technical Director
International Public Sector
Accounting Standards Board
International Federation of Accountants
277 Wellington Street, 4th Floor
Toronto, Ontario M5V 3H2
CANADA

Lausanne, June 7, 2011

Swiss Comments to
Consultation Paper Conceptual Framework, Phase 3

Dear Stephenie,

With reference to the request for comments on the proposed Consultation Paper, we are pleased to present the Swiss Comments to the Phase 3 of the Conceptual Framework.

We thank you for giving us the opportunity to put forward our views and suggestions. You will find our comments in the attached document.

Should you have any questions, please do not hesitate to contact us.

Yours sincerely,

SRS-CSPCP

Prof Nils Soguel, President

Sonja Ziehli, Secretary

Swiss Comments to the Phase 3 of the CF

Schweizerisches Rechnungslegungsgremium für den öffentlichen Sektor (SRS)
Conseil suisse de présentation des comptes publics (CSPCP)
Commissione svizzera per la presentazione della contabilità pubblica (CSPCP)
Swiss Public Sector Financial Reporting Advisory Committee

Swiss Comments to the Consultation Paper

Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: Measurement of Assets and Liabilities in Financial Statements Phase 3

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1. Introduction

During its meeting on May 23, 2011, the Swiss Public Sector Financial Reporting Advisory Committee agreed upon the following statement for the attention of the IPSAS Board. The Swiss Public Sector Financial Reporting Advisory Committee (SRS-CSPSP) was established in 2008 by the Swiss Federal Ministry of Finance together with the Ministers of Finance at the cantonal level. One of its aims is to provide the IPSAS Board with a consolidated statement for all the three Swiss levels of government (municipalities, cantons and Confederation).

2. Fundamental Comments on the Consultation Paper

None.

3. Detailed Comments on the Specific Matters for Comment

3.1 Specific Matter for Comment 1

Should the role of the Framework be to identify factors that are relevant in selecting a measurement basis for particular assets and liabilities in specific circumstances, rather than specify a single measurement basis or combination of bases?

- We regard the discussion on when which basis should be used as being part of each specific Standard.
- The *Conceptual Framework* should permit different measurement bases.

3.2 Specific Matter for Comment 2

If, in your view the Framework should specify a measurement basis or combination of bases (or approach in the case of deprival value), which should that be?

Single Measurement Bases
(a) Historical cost.
(b) Market value.
(c) Replacement cost.

Combinations of Bases/Approach
(d) Deprival value.
(e) Historical cost and market value.
(f) Replacement cost and market value.
(g) Historical cost, replacement cost, and market value.

Others
(h) Another measurement basis or combination of bases/approach.

Please explain why you support a particular measurement basis or combination of measurement bases/approach and your reasons for rejecting alternatives.

- The combination of approaches (e) *„Historical cost and market value*" is preferred. A single measurement basis does not appear to be appropriate.
- For the measurement according to one approach or the other the use of the asset is decisive.

- For assets used operationally (*Administrative Assets*) measurement must be made on the „*Historical cost*" basis, for assets held for income (*Non Administrative Assets*) on the „Market value" basis.
- The difference between Administrative Assets and Non Administrative Assets was discussed in detail in the Comments to Phase 2 of the *Conceptual Frameworks* (Heading 3.5.2. (b).

In the approach (c) „*Replacement cost*" we see various disadvantages:
- There is latitude in determining the „optimised" *Replacement costs* for the required service potential.
- The demarcation between an increase in the replacement costs and an increase in the general quality level is not easy.
- The balance sheet amounts reflect future decisions.
- The depreciation periods are less predictable and tend to be progressive.
- Realisation of the approach in the accounts has not been exactly specified.

In the *Deprival value* model we see the following disadvantages:
- No advantages are apparent in comparison with the measurement with cost of acquisition and consistent Impairment guidelines.
- A situative use of the *Replacement cost* model does not seem sensible (disadvantages see above).
- The model is judged to be complex and would probably involve greater cost. It seems to be better if when which measurement basis is to be applied (one time decision) is described in the specific Standards. The different possibilities should not be packed in a single model (recurring decisions necessary).

3.3 Specific Matter for Comment 3

The Consultation Paper discusses the following measurement bases: historical cost, market value, and replacement cost. It also discusses the deprival value concept which does not describe a single measurement basis, but rather a means by which a basis may be selected that is relevant to the circumstances. Value in use and net selling price are discussed in the context of the deprival value model.
In your view, is this discussion complete, balanced and fair? If not, please indicate what in your view is missing or in what respects you consider the discussion does not draw out the strengths and weaknesses of the various bases (or approach in the case of deprival value).

- There is too little focus on the function, which the balance sheet should fulfil.
- The differences in the bases in practice could be better described.
- The accounting implementation of the „*Replacement cost*" model should be described (does the value adjustment pass through the income statement or directly through equity?).

3.4 Specific Matter for Comment 4

In your view, should:

(a) The effect of an entity's own credit risk be reflected in the measurement of liabilities at initial recognition; and

In principle no, with the exception of the provisions.

(b) The effect of changes in own credit risk be reflected when liabilities are subsequently remeasured?

No. In this way unnecessary volatility can be avoided.

3.5 Specific Matter for Comment 5

In your view, where assets are not restricted in use and therefore may be sold for an alternative use, should the measurement reported in the statement of financial position reflect:

(a) Only the service potential relating to the existing use; or

Yes.

(b) Include the incremental value relating to its possible sale for an alternative use?

No.

Lausanne, June 7, 2011

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RÉPUBLIQUE FRANÇAISE

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Référence : 2011/06/1494

Paris, le 10 juin 2011

Ms Stephenie FOX
Technical director
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Re : Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: Measurement of Assets and Liabilities in Financial Statements.

Dear Ms Fox,

I am writing on behalf of the French « Direction Générale des Finances Publiques » to comment on the IPSASB Consultation Paper "Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: Measurement of Assets and Liabilities in Financial Statements" ('the CP').

We welcome the decision of the Board to issue a consultation on the elaboration of a conceptual framework for public entities.

Le directeur,
adjoint au directeur général des finances publiques

Vincent MAZAURIC

MINISTÈRE DU BUDGET
DES COMPTES PUBLICS
DE LA FONCTION PUBLIQUE
ET DE LA RÉFORME DE L'ÉTAT

French original version of our response to the CP "Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: Measurement of Assets and Liabilities in Financial Statements"

Nous vous prions de bien vouloir trouver ci-après la réponse de la Direction générale des Finances publiques (DGFiP) sur le document de consultation susmentionné.

Commentaire général :

Dans le cadre de l'accomplissement de ses missions régaliennes et de régulateur économique et social, les actifs et les passifs du secteur public présentent des spécificités qui n'ont pas d'équivalent dans le secteur privé. Il en résulte l'application de méthodes d'évaluation adaptées. C'est le cas par exemple de certaines infrastructures pour lesquelles il n'existe pas de référence de marché et qui sont évaluées au coût de remplacement.

Par ailleurs, ces missions s'inscrivant dans un cadre pérenne, la valeur d'acquisition des actifs n'est pas toujours connue. Nous pouvons citer comme exemple la valeur des monuments historiques et de certaines œuvres d'art.

De plus, il convient de rappeler que la majeure partie des activités du secteur public est de caractère non marchand. En conséquence, la valeur de marché semble inadaptée dans la plupart des cas, dans la mesure où le secteur public n'a pas vocation à faire du négoce sur ses actifs et ses passifs.

Question 1:

Le cadre conceptuel doit-il avoir pour rôle d'identifier les facteurs pertinents pour la sélection d'une méthode d'évaluation d'un actif ou d'un passif particulier, dans des conditions spécifiques, ou doit-il plutôt sélectionner la méthode ou la combinaison de méthodes ?

Les caractéristiques du secteur public rappelées dans notre commentaire général (nature spécifique des actifs et des passifs ; pérennité de l'action du secteur public ; activité principalement non marchande) doivent être identifiées dans le cadre conceptuel afin de choisir la méthode d'évaluation des actifs et des passifs la plus adaptée. Dès lors, en fonction des caractéristiques des actifs et des passifs, le cadre conceptuel pourra préconiser une combinaison de méthodes d'évaluation.

Question 2:

Dans le cas où selon vous le cadre conceptuel doit spécifier une méthode d'évaluation ou une combinaison de méthodes (ou d'approches, dans le cas du modèle « deprival value »), cela doit-il être :

Une méthode d'évaluation unique :

(a) le coût historique

(b) la valeur de marché

(c) le coût de remplacement

Une combinaison de différentes méthodes/approches :

(d) deprival value

(e) le coût historique et la valeur de marché

(f) le coût de remplacement et la valeur de marché

(g) le coût historique, le coût de remplacement et la valeur de marché

Autres :

(h) une autre méthode d'évaluation ou une autre combinaison de méthodes.

La réponse devrait présenter les raisons pour retenir une méthode particulière ou une combinaison de méthodes / approches et rejeter les autres.

Dans la mesure où le cadre conceptuel doit, selon la DGFiP, spécifier une combinaison de méthodes d'évaluation des actifs et des passifs à appliquer en fonction de leurs caractéristiques et des informations disponibles, la DGFiP privilégie la combinaison de méthodes suivante : coût historique, coût de remplacement et valeur de marché.

Selon la DGFiP, cette combinaison de méthodes ne semble pas devoir écarter une évaluation à l'euro symbolique pour les biens à caractère historique et culturel.

La DGFiP privilégie la méthode du coût historique lorsque cette méthode est applicable, c'est-à-dire lorsqu'il est possible de reconstituer le coût d'acquisition. Cette méthode est en effet la plus largement utilisée par les entités du secteur public.

En revanche, lorsqu'il n'est pas possible de reconstituer le coût historique, la DGFiP préconise le recours à la méthode de la valeur de marché, dans la mesure où il existe un marché suffisamment actif.

Par ailleurs, lorsque la nature des actifs à évaluer est tellement spécifique qu'il n'existe pas de marché et que le coût historique n'est pas pertinent, la DGFiP considère que la méthode du coût de remplacement doit être privilégiée.

S'agissant des passifs et notamment de la dette financière, la DGFiP considère qu'ils doivent être évalués selon la méthode du coût historique. Cependant, par exemple, l'annexe aux comptes de l'Etat fournit des éléments complémentaires relatifs à l'évaluation en valeur de marché, mais à titre d'information complémentaire.

La DGFiP considère que l'approche en « deprival value » n'est pas à proprement parler une méthode d'évaluation mais davantage un arbre de décision pour choisir la méthode de valorisation appropriée. En effet, cette approche conduit à retenir la plus faible valeur entre le coût de remplacement et la valeur « recouvrable » (pour laquelle il convient de retenir la plus forte valeur entre la valeur d'usage et la valeur nette de cession). La DGFiP souhaite de ce fait exclure cette approche du fait de la complexité de sa mise en œuvre. En effet, la préparation des états financiers et le choix d'une méthode de valorisation doivent s'effectuer dans le respect du rapport coût/avantage.

Question 3:

Le document de consultation analyse les méthodes d'évaluation suivantes : coût historique, valeur de marché, coût de remplacement. Il présente également le modèle de « deprival value », qui ne décrit pas une méthode d'évaluation mais plutôt une approche pour choisir la technique d'évaluation pertinente dans un contexte donné. La valeur d'usage et le prix net de cession sont présentés dans le contexte de cette approche.

Selon vous, cette analyse est-elle complète, équilibrée et juste? Si cela n'est pas le cas, indiquez quels sont selon vous les éléments manquants, et dans quelle mesure la discussion ne rend pas compte des forces et faiblesses des différentes méthodes (ou approche dans le cas de la « deprival value »).

La DGFiP considère que l'analyse des méthodes d'évaluation relatives au coût historique, à la valeur de marché et au coût de remplacement, qui est présentée dans le document de consultation, présente de façon détaillée et équilibrée les avantages et les inconvénients de chacune de ces méthodes.

Question 4:

Selon vous :

(a) Le risque crédit propre d'une entité doit-il être intégré dans l'évaluation des passifs lors de leur comptabilisation initiale ?

(b) Lors des évaluations ultérieures, les effets de la variation du risque crédit propre doivent-ils être reflétées ?

(a) La DGFiP considère que le risque crédit propre à une entité fait partie intégrante de l'instrument financier émis et ne doit pas faire l'objet d'une évaluation indépendante.

(b) L'évaluation ultérieure en valeur de marché des passifs financiers ne semble pas adaptée au secteur public, et notamment aux comptes de l'Etat, ce dernier faisant appel principalement à des instruments financiers qui ont vocation à être détenus jusqu'à leur échéance.

Question 5:

Selon vous, lorsque les actifs ne sont pas dédiés à une utilisation, et que en conséquence ils pourraient être vendus pour un autre usage, leur évaluation dans les états financiers doit-elle :

(a) Refléter uniquement le potentiel de service associé à l'utilisation actuelle ? ou

(b) Inclure une revalorisation en relation avec la cession possible du bien pour un autre usage?

Pour les raisons évoquées ci-dessus, la DGFiP considère que les actifs doivent être évalués en fonction de leur nature. En conséquence, l'intention de les céder ou de leur conférer un autre usage ne doit pas être prise en compte dans leur évaluation, d'autant plus que les missions du secteur public revêtent un caractère principalement non marchand.

English version of our response to the CP "Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: Measurement of Assets and Liabilities in Financial Statements"

You will find below our detailed response to the Consultation Paper ("the CP").

General comment:

Within the framework of the fulfilment of its sovereign missions and its missions of economic and social regulator, the public sector's assets and liabilities present specificities which have no equivalent in the private sector. It results from it the application of adapted valuation methods. It is the case for example of certain infrastructures for which there is no market value and that are estimated at the replacement cost.

Besides, these missions joining a long-lasting frame, the purchase price of assets is not always known. We can quote as, for example, the value of historic monuments and some works of art.

Furthermore, it is advisable to remind that the major part of the activities of the public sector is of not trade character. Consequently, the market value seems unsuitable in most of the cases, as far as the public sector does not aim to sell its assets and its liabilities.

Specific Matter for Comment 1

Should the role of the Framework be to identify factors that are relevant in selecting a measurement basis for particular assets and liabilities in specific circumstances, rather than specify a single measurement basis or combination of bases?

The characteristics of the public sector called back in our general comment (specific nature of assets and liabilities, perpetuity of the action of the public sector; mainly not trade activity) must be identified in the conceptual framework to choose the valuation method of assets and liabilities the most adapted. From then on, according to the characteristics of assets and liabilities, the conceptual framework should recommend a combination of valuation methods.

Specific Matter for Comment 2

If, in your view the Framework should specify a measurement basis or combination of bases (or approach in the case of deprival value), which should that be?

Single Measurement Bases

(a) Historical cost.

(b) Market value.

(c) Replacement cost.

Combinations of Bases/Approach

(d) Deprival value.

(e) Historical cost and market value.

(f) Replacement cost and market value.

(g) Historical cost, replacement cost, and market value.

Others

(h) Another measurement basis or combination of bases/approach.

Please explain why you support a particular measurement basis or combination of measurement bases/approach and your reasons for rejecting alternatives.

In our view, we consider that the conceptual framework has to specify a combination of valuation methods for assets and liabilities linked to their characteristics and available information. Consequently, the DGFiP privileges the following combination of methods: historical cost, replacement cost and market value.

According to the DGFiP, this combination of methods should not exclude an evaluation at the symbolic euro for heritage assets.

The DGFiP privileges the historical cost method when this method is applicable, that is when the acquisition cost is known. Indeed, this method is used most widely by the public sector entities.

When it is not possible to reconstitute the historical cost, the DGFiP recommends the use of the market value method, as far as there is an active market.

Besides, when the nature of assets to be estimated is so specific that there is no market and that the historical cost is not relevant, the DGFiP considers that the replacement cost method should be used.

As regards the liabilities and in particular the financial debt, the DGFiP considers that they must be estimated according to the historical cost method. However, for example, the notes to the financial statements of the central government should supply additional elements relative to the evaluation at market value, but as additional information.

The DGFiP considers that the « deprival value » approach is not strictly speaking a valuation method but more a decision tree to choose the appropriate valuation method. Indeed, this approach leads to hold the lowest value between the replacement cost and the "recoverable" value (for whom it is advisable to retain the strongest value between the value in use and the net selling price). In our view, this approach should not be used because of the complexity of its implementation. Indeed, the preparation of financial statements and the choice of a valuation method have to be made in the respect for the cost / benefits ratio.

Specific Matter for Comment 3

The Consultation Paper discusses the following measurement bases: historical cost, market value, and replacement cost. It also discusses the deprival value concept which does not describe a single measurement basis, but rather a means by which a basis may be selected that is relevant to the circumstances. Value in use and net selling price are discussed in the context of the deprival value model.

In your view, is this discussion complete, balanced and fair? If not, please indicate what in your view is missing or in what respects you consider the discussion does not draw out the strengths and weaknesses of the various bases (or approach in the case of deprival value).

The DGFiP considers that the analysis of valuation methods relative to the historical cost, to the market value and to the replacement cost, which is mentioned in the consultation paper, presents in a detailed and balanced way the advantages and the inconveniences of each of these methods.

Specific Matter for Comment 4

In your view, should:

(a) The effect of an entity's own credit risk be reflected in the measurement of liabilities at initial recognition; and

(b) The effect of changes in own credit risk be reflected when liabilities are subsequently remeasured?

(a) The DGFiP considers that an entity's own credit risk is an integral part of the emitted financial instrument and does not have to be valued independently.

(b) Using the market value to measure the financial liabilities does not seem appropriate to the public sector, in particular to the financial statements of the central government, as the French central government mainly hold financial instruments to maturity.

Specific Matter for Comment 5

In your view, where assets are not restricted in use and therefore may be sold for an alternative use, should the measurement reported in the statement of financial position reflect:

(a) Only the service potential relating to the existing use; or

(b) Include the incremental value relating to its possible sale for an alternative use?

For the reasons mentioned above, the DGFiP considers that assets must be estimated according to their nature. Consequently, the intention to sell them should not be taken into account to determine their value, especially since the public sector's missions do not take on mainly a trade character.

Phase 3-Appendix 1

Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: Measurement of Assets and Liabilities in Financial Statements

Specific Matter for Comment 1

Should the role of the Framework be to identify factors that are relevant in selecting a measurement basis for particular assets and liabilities in specific circumstances, rather than specify a single measurement basis or combination of bases?

We consider that the framework should simply identify the factors that are relevant in selecting measurement bases for assets and liabilities.

However we also consider that the framework should consider the circumstances (if any) where assets/liabilities should be measured at:

- *Notional value (e.g. for historical/community assets); or*
- *Historical value: or*
- *Current value.*

Consideration of how current value should be measured (e.g. by fair value, fulfilment value, depreciated replacement cost, market value, deprival value etc) should instead be undertaken when developing specific IPSAS within the factors identified in the framework.

Specific Matter for Comment 2

If, in your view the Framework should specify a measurement basis or combination of bases (or approach in the case of deprival value), which should that be?

Single Measurement Bases

(a) Historical cost.

(b) Market value.

(c) Replacement cost.

Combinations of Bases / Approach

(d) Deprival value.

(e) Historical cost and market value.

(f) Replacement cost and market value.

(g) Historical cost, replacement cost, and market value.

Others

(h) Another measurement basis or combination of bases / approach.

Please explain why you support a particular measurement basis or combination of measurement bases / approach and your reasons for rejecting alternatives.

As noted above, we do not consider that the framework should specify measurement bases.

Specific Matter for Comment 3

The Consultation Paper discusses the following measurement bases: historical cost, market value, and replacement cost. It also discusses the deprival value concept which does not describe a single measurement basis, but rather a means by which a basis may be selected that is relevant to the circumstances. Value in use and net selling price are discussed in the context of the deprival value model.

In your view, is this discussion complete, balanced and fair? If not, please indicate what in your view is missing or in what respects you consider the discussion does not draw out the strengths and weaknesses of the various bases (or approach in the case of deprival value).

We agree that the CP discussion is complete, balanced and fair.

Specific Matter for Comment 4

In your view, should:

(a) The effect of an entity's own credit risk be reflected in the measurement of liabilities at initial recognition; and

(b) The effect of changes in own credit risk be reflected when liabilities are subsequently remeasured?

We agree that, ideally, own credit risk should be reflected in the measurement of liabilities at initial recognition. As noted in paragraph A12 of the CP, when a liability is issued for a consideration the entity's credit risk affects the amount that is received in exchange for its issue. However there are practical difficulties associated with calculating own credit risk for other categories of liabilities. We consider therefore that IPSASB should undertake research in this area to establish to what extent these risks can be measured before concluding on this matter.

We agree that there is a theoretical argument for the effects of changes in own credit risk being reflected when liabilities are subsequently re-measured. However because of the counter-intuitive results of such changes, we do not consider an approach is tenable in practice.

Specific Matter for Comment 5

In your view, where assets are not restricted in use and therefore may be sold for an alternative use, should the measurement reported in the statement of financial position reflect:

(a) Only the service potential relating to the existing use; or

(b) Include the incremental value relating to its possible sale for an alternative use?

(a) Where assets are held to support service provision, they should be valued on the basis of service potential relating to the existing use.

Where assets are held in order to generate an economic return, they should be valued at free market value. As we note in our response to Specific Matter for Comment 1, specific measurement bases should be considered in individual standards.

(b) The inclusion of incremental values based on market values relating to possible sale for an alternative use would, in our view, undermine the consistency, understandability and comparability of the accounts.

Assets valued on the basis of service potential should only be re-measured at free market value when re-classified as 'held for sale'. As we note in our response to Specific Matter for Comment 1, specific measurement bases should be considered in individual standards.