

Quito, Mayo 2024

R-03-05-IPSAS

Mr. Ian Carruthers
Chairman International Public Sector Accounting Standards Board,
International Federation of Accountants,
277 Wellington Street West,
Toronto, Ontario M5V 3H2 CANADA

Dear Ian Carruthers,

Subject: Comment letter on Exposure Draft 88, "Arrangements Transferring Rights to Assets (Amendments to IPSAS 47 and IPSAS 48)".

For the College of Public Accountants of Ecuador, we are pleased to provide comments on Draft Standard 88, "Arrangements Transferring Rights to Assets (Amendments to IPSAS 47 and IPSAS 48)", issued by the International Public Sector Accounting Standards Board (IPSASB) of the International Federation of Accountants (IFAC). Our comments on Exposure Draft 88 are below.

Specific topic for comment 1:

The IPSASB decided to transfer the proposals from ED 84 to IPSAS 23, Income from Non-Exchange Transactions (Taxes and Transfers) related to concession in concessional leases under IPSAS 47 (see paragraphs IPSAS 47. BC 141 - BC 145).

Do you agree with the proposed modifications to IPSAS 47? If not, explain your reasons. If you agree, please provide any additional reasons not already discussed in the Basis for Conclusions.

Specific topic for comment 2:

The IPSASB decided to propose unauthorized guidance for arrangements transferring rights over assets in IPSAS 47 (see paragraphs IPSAS 47. BC 146 - BC 150).

Do you agree with the proposed unauthorized amendments to IPSAS 47? If not, explain your reasons. If you agree, please provide any additional reasons not already discussed in the Basis for Conclusions.

Specific topic for comment 3:

The IPSASB decided to propose unauthorized guidance for agreements that transfer rights to assets without consideration in IPSAS 48 (see paragraphs IPSAS 48. BC 41 - BC 44).

Do you agree with the proposed non-normative amendments to IPSAS 48? If not, explain your reasons. If you agree, please provide any additional reasons not already discussed in the Basis for Conclusions.

Answer comment 1:

Yes, we agree the proposals to transfer from ED 84 to IPSAS 23, Income from Non-Exchange Transactions (Taxes and Transfers)

Answer comment 2:

No, we think that in the guidance for arrangements transferring rights over assets in IPSAS 47. In paragraph AG153A regarding the present value of lease payments must include consideration of IPSAS 43, Lease Term P.20 to define the term based on certainties and incentives.

Answer comment 3:

Yes, we agree the proposal the guidance for agreements that transfer rights to assets without consideration in IPSAS 48

Please feel free to contact us in case any further clarification in this regard is required.

Regards,

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