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Public Sector Combinations

I am Denise Juvenal this pleasure to have the opportunity to comment on this consultation. This is my individual commentary for IFAC-IPSASb about Public Sector Combinations.

Guide for Respondents

The IPSASB would welcome comments on all of the matters discussed in this Exposure Draft. Comments are most helpful if they indicate the specific paragraph or group of paragraphs to which they relate, contain a clear rationale and, where applicable, provide a suggestion for alternative wording.

The Specific Matters for Comment request for the Exposure Draft are provide below.

Specific Matter for Comment 1

Do you agree with the scope of the Exposure Draft? If not, what changes to the scope would you make?

Yes, I agree with the scope of the Exposure Draft, so I suggest for IPSASB, if agrees, that observes for some aspects the government elaborated contracts for specific activities, I do not know if these contracts can have impact in the identification of Public Sector Combinations, I have doubt in relation this point.

Specific Matter for Comment 2:

Do you agree with the approach to classifying public sector combinations adopted in this Exposure Draft (see paragraphs 7-14 and AG10 – AG50)? If not, how would you change the change the approach to classifying public sector combinations?

Yes, I agree with the approach to classifying public sector combinations adopted in this Exposure Draft.

Specific Matter for Comment 3:

Do you agree that the modified pooling of interests method of accounting should be used in accounting for amalgamations? If not, what method of accounting should be used?

Yes, I agree that the modified pooling of interests method of accounting should be used in accounting for amalgamations, so, I suggest for the Board's, if agrees consults National Regulators, because I do not know if internal laws have some impact in relation in accounting for amalgamations, principally federal laws

Specific Matter for Comment 4:

Do you agree to adjustments being made to the residual amount rather than other components of net assets/equity, for example the revaluation surplus? If not, where should adjustments be recognized?

Yes, I agree with adjustments being made to the residual amount rather than other components of net assets/equity, so, I suggest for the Board's if agrees consults National Regulators, because I do not know if internal laws have some impact in relation in revaluation surplus, principally federal laws.

Do you agree that the residual amount arising from an amalgamation should be recognized:

- a) In the case of an amalgamation under common control, as an ownership contribution or ownership distribution; and**
- b) In the case of an amalgamation not under common control, directly in net assets/equity? If not, where should the residual amount be recognized?**

Yes, I agree with the residual amount arising from an amalgamation should be recognized: in the case of an amalgamation under common control, as an ownership contribution or ownership distribution; and In the case of an amalgamation not under common control, directly in net assets/equity, so, I suggest for the Board's if agrees

consults National Regulators because I do not know if internal laws have some impact in relation in residual amount be recognized, principally federal laws.

Specific Matter for Comment 5:

Do you agree that the acquisition method of accounting (as set out in IFRS 3, Business Combinations) should be used in accounting for acquisitions? If not, what method of accounting should be used?

Yes, I agree with the acquisition method of accounting (as set out in IFRS 3, Business Combinations) should be used in accounting for acquisitions, so, I suggest for the Board's if agrees consults National Regulators, because I do not know if internal laws have some impact in relation what method of accounting should be used, principally federal laws.

Thank you for opportunity for comments this proposal, if you have questions do not hesitate contact to me, rio1042370@terra.com.br.

Yours,

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