



15 August 2013

Ms. Stephenie Fox
Technical Director
International Public Sector Accounting Standards Board
International Federation of Accountants
277 Wellington Street West
Toronto, Ontario M5V 3H2
CANADA

Dear Stephenie

CONCEPTUAL EXPOSURE DRAFT 4 - CONCEPTUAL FRAMEWORK FOR GENERAL PURPOSE FINANCIAL REPORTING BY PUBLIC SECTOR ENTITIES: PRESENTATION IN GENERAL PURPOSE FINANCIAL REPORTS

The Accountant General Office of Malaysia ("AG Office") and the Malaysian Institute of Accountants ("MIA") are pleased to provide comments on the International Public Sector Accounting Standards Board ("IPSASB") Exposure Draft ("ED") on Conceptual Framework for General Purpose Financial Reporting by Public Sector Entities: Presentation in General Purpose Financial Reports.

General Comments:

The ED has described the framework for presentation in general purpose financial reports ("GPFs") which involved selection, location and organisation of information being displayed and disclosed in the GPFs appropriately. Our understanding is that presentation decisions on the selection, location and organization of information, consider the following:

- Needs of users;
- Objectives of financial reporting, which are to provide information useful for accountability and decision-making purposes;
- Qualitative characteristics ("QCs"), being relevance, faithful representation, understandability, timeliness, comparability and verifiability;
- Pervasive constraints, being materiality, cost-benefit and achieving an appropriate balance between the QCs; and
- High and lower level decisions which involved financial statements, other GPFs and within a report.

We observe that the above were repeated in Section 2, Section 3 and Section 4 of the ED, even though they have been discussed in relation to different areas ie information selection, information location and information organization. We suggest the IPSASB to consider the discussion of the above, in general, rather than repetitive discussion in various sections. We believe Section 1 of the ED can be maintained except for paragraph 1.8 to 1.10 on the 'presentation decisions'. We suggest the presentation decisions can be moved to a new section titled Presentation Decisions which discusses the factors for consideration above. Such new section can be located after the discussion on information selection, information location and information organisation which should also be in general.

We suggest such approach as we believe that the presentation framework is a form of 'checklist' to guide the IPSASB in developing International Public Sector Accounting Standards ("IPSASs") and Recommended Practice Guidelines ("RPGs") as well as such framework should be principle-based rather than specific.

Specific Comments:

We agree with all Specific Matters for Comment ("SMC") raised in the ED. In relation to SMC 5, paragraph 3.10 states that 'for other GPFs, displayed information may either be located separately from disclosed information or located in the same area, but distinguished from disclosed information and given prominence through the use of some other presentation technique'. We would like to clarify what would 'other presentation technique' entails.

We hope our comment would contribute to the IPSASB deliberation in finalising the ED. If you have any queries or require clarification of this submission, please contact Rasmimi Ramli (rasmimi@mia.org.my).

Yours sincerely,



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