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Analysis of International Accounting Regulations with Regards to Fair Value

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Abstract
Unifying the economical-financial information at an international level represents today, within the context of the globalization and integration of the financial markets around the world, an important and urgent demand. One of the coordinates of accounting globalization is the *fair value* based valuation system. This tendency arises from the contents of international accounting standards and from the progress of world-wide regulating practice. The economic and market events of the past years have highlighted the importance of fair value measurements used in financial statements and have emphasized the need for consistency and comparability in those measurements in financial statements prepared around the globe.

Keywords: fair value, harmonization, IASB, FASB, Accounting Directive, IFRS, FAS, Exposure Draft

JEL Classifications: M41

1. Introduction

For the past decade, to improve the decision-making relevance of financial statements, the Financial Accounting Standards Board (FASB) has been adding more fair value recognition, measurement, and disclosure standards to the body of U.S. generally accepted accounting principles (U.S. GAAP). The International Accounting Standards Board (IASB) follows a similar approach. As a result, a mixed accounting model has been developed, which is still primarily based on historical cost but with an ever increasing application of fair value accounting.

Amongst the research methods most often used in this paper, we may mention the *method of document analysis*, given that the main purpose of the paper is to analyse the provisions of international accounting standards with regards to fair value. Therefore, it became unavoidable to use tenet bibliographic sources, accounting standards and regulations, comparative studies and reviews of accounting practices in use. We have found it necessary to present the evolution of how the concept of fair value was defined and implemented, with regards to both the two sets of accounting standards (issued by the IASB and FASB), given that, recently, international regulating bodies have requested a stronger use of fair value and, therefore, that it be applied extensively, and in that which concerns the directive of the European Union.

At an international level, one may note today the supremacy of two sets of accounting standards: the international ones issued by the IASB (International Accounting Standards Board), and he American ones issued by the FASB (US Financial Accounting Standards Board). Initially, the IASB remained neutral as to the valuation bases required. However, as of late, the international regulating body – as well as the American one – have been pushing for a stronger use of fair value and that it be applied extensively.

The IASB has accepted its own way the influence of the FASB regulations through the fact that it participates in common projects with the FASB, such projects aiming to reduce the differences between the IFRS (International Financial Reporting Standards) and the US GAAP (US General Accepted Accounting Practices). More specifically, there is an agreement signed in 2002 that aimed to bring to a common stand the two sets of regulations. The agreement included reconsidering certain concepts and terms and unifying specific classifications and treatments. Among others, the IASB committed itself to intensify the use of *fair value* as valuation basis. Some of the decisions made within the scope of this project, published in December 2003, included the following:

- the estimates concerning fair value must be based, in all cases, on valuation methods that maximize the inputs from an active market, even if the asset (debt) is not exchanged on an active market;
- these methods take into account an approach that is market-based, supported by the result and, whenever that is the case, on costs;
- the valuation premises must describe the current and hypothetical usage conditions, as well as the location of an asset, as follows:
    - the premise of continuing the usage for estimating fair value, when the asset is owned and used
    - the premise of sale or exchange, when the asset is owned in view of sale
- in the case of combined companies, it was agreed to use fair value as working principle in order to measure assets obtained or debts undertaken when combining companies.

Part of this project has already been translated into reality by the IASB publishing new international standards for financial reporting, IFRS 1 to IFRS 5. Amongst them, the influence of American standards is obvious in IFRS 5 „Non-current Assets Held for Sale and Discontinued Operation", respectively in IFRS 3 „Business Combinations", as suggested by two of the above-mentioned project decisions.

2. The stance of international regulators (IASB) towards fair value

He first rules of the IASB that were related to fair value were issued in 1995, within IAS 32 "Financial Instruments: Presentation" on presenting and information on financial instruments. This standard established a distinction between fair value and market value (Casta J.F., Colasse B. and others, 2001). Later, through IAS 39 „Financial Instruments: Recognition and Measurement" (1998) it was required that fair value be used compulsorily when recording into the balance sheet certain financial instruments, both for the initial valuation and for the subsequent one. Therefore, financial instruments were the first to require that the subject of fair value be approached.

Subsequently, the international regulating body issued a series of accounting standards, and among them the ones issued beginning with 1999 were meant to implement the "accounting system of the future". These are regulations related mostly to assets, such as the IAS 36 „Impairment of assets", which require that an asset be impaired if its accounting value is higher than the realizable value. Another example is the IAS 39 "Measurement and Recognition of Financial Instruments", applicable as of January 2001, which indicates the treatment of latent losses and gains related to the revaluation of a financial instrument at its fair value. The latter standard assigns international acknowledgement to the fair value.

Among the assets acknowledged in financial statements and which are subject to the IASB regulations, it was the financial instruments, in particular fixed tangible assets, which have given rise to the largest amount of specifications with regards to obtaining their fair value. As far as the other assets or debts are concerned, the contents of the IAS/IFRS refer to market value or updated value as representations of the fair value.

International Accounting Standards Board (IASB) has issued an Exposure Draft, "Fair Value Measurement" for comment by September 29, 2009. To reduce complexity and improve consistency of application, the Exposure Draft (ED) proposes a single definition of and source of guidance for measuring fair value. The ED specifies how, not when, entities should measure assets and liabilities at fair value. The ED also recommends enhanced disclosures about fair value to enable users of financial statements to assess the extent to which fair value is used and to inform them about the inputs used to derive those fair values.

The Board's objectives for publishing the proposed IFRS are:
(a) to establish a single source of guidance for all fair value measurements required or permitted by IFRSs to reduce complexity and improve consistency in their application;
(b) to clarify the definition of fair value and related guidance in order to communicate the measurement objective more clearly; and
(c) to enhance disclosures about fair value to enable users of financial statements to assess the extent to which fair value is used and to inform them about the inputs used to derive those fair values (ED/2009/5 issued by IASB in May 2009).

The proposed IFRS does not require additional fair value measurements. We must notice that the Exposure Draft *Fair Value Measurement* is published by the International Accounting Standards Board (IASB) for comment only. The proposals may be modified in the light of the comments received before being issued as an International Financial Reporting Standard (IFRS). The proposed guidance deals with how fair value should be measured where it is required by existing standards. If adopted, the proposals would replace fair value measurement guidance contained within individual IFRSs with a single, unified definition of fair value, as well as further authoritative guidance on the application of fair value measurement in inactive markets.

The ED proposes a fair value hierarchy that prioritises into three levels the inputs to valuation techniques used to measure fair value:

- Level 1 inputs are quoted prices (unadjusted) in active markets for identical assets or liabilities that the entity can access at the measurement date. An active market for the asset or liability is a market in which transactions for the asset or liability take place with sufficient frequency and volume to provide pricing information on an ongoing basis.
- Level 2 inputs are inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (ie as prices) or indirectly (ie derived from prices). Adjustments to Level 2 inputs will vary depending on factors specific to the asset or liability. Those factors include the condition or location of the asset, the extent to which the inputs relate to items that are comparable to the asset or liability, and the volume and level of activity in the markets within which the inputs are observed.
- Level 3 inputs are inputs for the asset or liability that are not based on observable market data (unobservable inputs). unobservable inputs shall reflect the assumptions that market participants would use when pricing the asset or liability, including assumptions about risk. In developing unobservable inputs, an entity may begin with its own data, which shall be adjusted if reasonably available information indicates that (a) other market participants would use different data or (b) there is something particular to the entity that is not available to other market participants (e.g. an entity-specific synergy), and the entity is ableto quantify these adjustments.

The ED proposes various disclosures about how assets and liabilities were measured at fair value — "information that enables users of its financial statements to assess the methods and inputs used to develop those measurements and, for fair value measurements using significant unobservable inputs (Level 3), the effect of the measurements on profit or loss or other comprehensive income for the period" (ED/2009/5 issued by IASB in May 2009).

We should also highlight the fact that, until 2009, when it issued the Exposure Draft *Fair Value Measurement*, the IASB had not issued any regulation dedicated exclusively to fair value, but contented itself to make certain amendments to the IAS 16 „Property, Plant and Equipment". Certainly, there are other IASB standards that refer to fair value, but they don't make sufficient specifications as to the means for obtaining it. We expect the current debates on the subject of fair value to be also translated, in the future, within international accounting standards.

In that which concerns fixed tangible assets, they are discussed in the IAS 16 „Property, Plant and Equipment", the IAS 40 „Investment Property", the IFRS 5 „Non-current Assets Held for Sale and Discontinued Operation".

Among the regulations referring to fixed tangible assets, the IAS 16 has been reviewed in terms of the content regarding fair value. Thus, in its initial form, the IAS 16 established that the fair value of lands and buildings was usually the *market value*. The standard did not provide an explicit explanation on the exact methods for valuating assets in order to estimate their fair value. In practice, most valuators thought that the IVS definition on market value should apply to all fixed assets.

The most important amendments made to the IAS 16, after the last review, which came into effect on January-1st-2005, from the perspective of understanding the concept of fair value, are as follows (Deaconu A., 2009):

If, before, historical cost valuation was considered as the basic treatment, and the revaluation conducted by professional valuators was the alternative treatment, in the current version this distinction is no longer present, so that historical cost no longer appears as an implicit preference.

Before, the IAS 16 established the fair value of real estate assets as being, usually, their market value. Subsequently, the presentation in the IAS 16 was amended with the specification that: the fair value of lands and buildings is generally determined on market bases, through a valuation normally conducted by qualified (authorised) professional valuators.

The previous IAS 16 did not refer to the use of ***net** replacement cost* for real estate assets, but only for plants and equipment. In the current version it is established that, if there is no market information for the fair value due to the specialized character of the property items, plants and equipment, and these items are rarely sold, except when they are part of a business unit, an entity may estimate fair value by using methods based on profit or on the net replacement cost.

The part of the IAS 16 which refers to impairment has been largely modified. There is a confirmation of the fact that, when establishing the residual value of an asset as part of the impairment calculation, the current value must be calculated assuming that the assets has reached the end of its active life within that entity, and thus no forecast is made as to what it might be at a given future date.

IAS 16 Property, Plant and Equipment as issued at 1 January 2009, provides that after recognition as an asset, an item of property, plant and equipment whose fair value can be measured reliably shall be carried at a re-valued amount, being its fair value at the date of the revaluation less any subsequent accumulated depreciation and subsequent accumulated impairment losses. Revaluations shall be made with sufficient regularity to ensure that the carrying amount does not differ materially from that which would be determined using fair value at the end of the reporting period.

In that which follows we will briefly discuss the main international accounting standards issued by the IASB which refer to fair value:

➢ **IFRS 2 „Share-based payment"**

Share-based payments made through capital instruments, as well as the transactions made in cash, must be valuated at fair value. All the changes related to this value will be acknowledged in the profit and loss account.

➢ **IFRS 3 „Business Combinations"**

The acquirer will assess the cost involved by the combination of companies as an aggregate amount between:

- the fair values, at the date of the transfer, of the given assets, contracted or undertaken debts, and own capital instruments issued by the acquirer in exchange for obtaining control over the acquired entity; and
- all the costs directly attributable to the business combination.

➢ **IAS 16 „Property, Plant and Equipment"**

The accepted alternative accounting treatment provides that tangible assets be revaluated at re-assessed value, which is the fair value at the moment of the re-assessment, minus the subsequent cumulated amortizations and value losses.

➢ **IAS 18 „Revenue"**

The valuation of revenues from ordinary activities is assessed at the fair value of the counter-performance that was or will be obtained, taking into account the value of any commercial discounts and the quantitative rebate accepted by the entity.

- **IAS 36 „Impairment of assets"**

Assets must be recorded in the balance sheet at a value lower or equal to their recoverable value. The recoverable value of an asset or a cash-generating asset is the highest value among its fair value minus sale costs and its usage value.

- **IAS 38 „Intangible assets"**

After the initial acknowledgement, an intangible asset can be valuated at its re-assessed value, which is its fair value at the date of the revaluation, minus any subsequent amortization incurred and any impairment loss incurred at a later date.

- **IAS 39 „Financial Instruments: Recognition and Measurement"**

Financial assets and liabilities are initially acknowledged and subsequently valuated at their fair value.

- **IAS 40 „Investment Property"**

Businesses may evaluate their real estate investments either at their accounting value minus impairment, or at their fair value, and the changes in the fair value are immediately acknowledged in the profit and loss account.

- **IAS 41 „Agriculture"**

Biological assets are acknowledged initially and for each date of the balance sheet at an accounting value equal to the fair value minus the costs estimated at the selling point. The changes in the fair value will be acknowledged in the profit and loss account.

3. The stance of American regulators (FASB) towards fair value

In the USA, there are two sets of regulations completing each other, issued by the **FASB**, as well as a set of regulations concerning generally accepted accounting principles.

The first two sets of regulations are as follows:

- conceptual regulations, called „Statements of financial accounting concepts" (SFAC), which establish accounting aims and create a guide for regulators when they are facing an operation for which there is no regulation available.
- Technical standards, called „Statements of financial accounting standards" (SFAS or FAS), which deal with well establish subjects.

The generally accepted accounting principles (GAAP) are made of conventions, rules and procedures that define the current accounting practice. The process of creating them is a painstaking one and it begins with the FASB who, working with the SEC (Securities and Exchange Commission) and members of the AICPA (American Institute of Chartered Public Accountants), issues them and passes them as generally accepted accounting principles. The basic accounting principles are included in the conceptual framework of the FASB, made of 7 accounting concepts (SFAC).

Among them, the SFAC statement no. 7, published in February 2000 and named "Using Cash Flow Information & Present Value in Accounting Measurements", places a more analytical focus on measurement systems than the other American standards. Thus, it presents the methodology for using updated treasury cash flows and present value in the measurement of assets and liabilities. More specifically, the SFAC 7 standard brings up two issues (Obert R., 2004):

- using fair value as a valuation principle
- the utility of the approach related to expected treasury cash flows as measurement means, as the standard provides exact rules in that regard.

Among the technical regulations, the FAS 5 „Accounting for contingencies" is destined to accounting and valuation rules. In order to be registered in the accounting records, an element of financial statements must be relevant to the user and reliably measurable. The FASB adds to the four valuation bases accepted by the IASB the valuation system based on the current market value.

In that which concerns the generally accepted accounting principles, they don't specifically discuss fair value as concept and the means for measuring it.

To provide a real guideline for professionals aiming to reliably determine the fair value, the American regulators have published the following:

- first, in December 1999, an exposure draft in preparation for a proposed Statement named „Reporting Financial Instruments and Certain Related Assets and Liabilities at Fair Value";
- second, a project called the SFAS 157 „Fair Value Measurements", issued in September 2006, which defines fair value, establishes a framework for measuring fair value in generally accepted accounting principles (GAAP), and expands disclosures about fair value measurements. This statement is effective for financial reporting fiscal periods commencing after November 15, 2007 and the interim periods applicable.
- third, a proposed Statement named SFAS 159 „*The Fair Value Option for Financial Assets and Financial Liabilities*", issued in 2007, which allows business to make a definitive choice on the initial and subsequent valuation of financial assets and debts at fair value, including in the result the differences that arise from the valuation. Thus, opting for fair value will allow business to measure their financial instruments at fair value, while acknowledging the "latent" gains and losses for the period of their occurrence. (Arlette C. Wilson & Beverly Marshall, 2007).

By the time Statement 157 was issued, there were more than 60 other accounting standards that either required or permitted the reporting of fair value measurements in the financial statements. However, many preparers and users of financial statements continued to express concerns about their ability to measure fair value using generally accepted accounting principles (GAAP) because there was limited and inconsistent guidance, which evolved over time in a piecemeal basis. The differences in the fair value measurement guidance presented in GAAP created inconsistencies in practice and complexities in financial reporting.

The FASB project „Fair Value Measurements" proposes to publish the means for measuring fair value so that the users of financial statements may see the effects of such choices over the documents at hand. Thus, it is expected that the consistency, reliability, and comparability of accounting information will increase once accounting literature is simplified.

Therefore, one may note that, when drafting the project, the FASB took into account the qualitative features of its conceptual framework, in particular the pertinence, reliability, and comparability of information. Thus, the information published with regards to fair value is useful for current and potential investors, creditors, and other third parties in making reasonable decisions on investment and financing.

According to some specialists (Mard, Michael J., 2008), in terms of a litigation there are three key implications arising from the use of fair accounting value within the scope of the FAS 157 standard and other similar standards. The first is that one may note an increase in the number of accounting litigations. The second implication stands in the fact that such litigation will focus on judging the professionals who draft financial statements and the auditors. The third one refers to the fact that fair value accounting and other tendencies of using accounting methods based on other values than historical cost may re-ignite a conflict that has been "boiling" for a while between the progress of financial reports on one hand and the litigation system on the other hand.

The reason behind the elaboration of the standard FAS 157 concerning the assessment of the fair value was to reunite the means of calculating the fair value stipulated in several norms. Specifications were also required in order to carry out relevant, credible estimations of the fair value in certain circumstances, especially when lacking market prices.

FASB 157 allows three valuation techniques to be used to measure fair value, witch are well known in the practice of evaluation (Casabona P., Shoaf V., 2007):

- The market approach uses observable prices and other relevant information generated by active market transactions involving identical or comparable assets or liabilities.
- The income approach uses valuation techniques to convert future cash flows or earnings to a single discounted present value. These valuation techniques include present value techniques, option-pricing models and the multi-period excess earnings method.
- The cost approach is based on the amount that currently would be required to replace the service capacity of an asset (often referred to as current replacement cost).

The FAS 157 supports the use of the market inputs (information) in estimating the fair value of an asset of a debt. Also the FASB facilitates the assessment of the fair values by establishing a *hierarchy of value*. The hierarchy grants the main priority to market inputs that reflect the prices of an active market for assets and identical debts (either discounted prices of some concluded transactions, or offered/requested prices). According to the hierarchy the input with lowest importance are the company inputs determined using own estimations and assumptions.

The hierarchy of value divides the inputs to be used for fair value assessment in three categories or levels, as it follows:

- <u>Level 1 of estimation</u>, that uses the market references

It is useful to be aware of the active market to which the company has *direct access*. If the company can access several markets, the most attractive market will be chosen. The market prices don't have to be adjusted for this type of estimation, as it is the case for all the other levels.

- <u>Level 2 of estimation</u>

This is the case when no market prices can be found for *identical* assets and debts. The procedure is to gather market information on *similar* assets and debts that are adjusted according to differences if the information is available.

- <u>Level 3 of estimation</u>

This level of value assessment is used if no identical or similar assets and debts are found, or if there is no reliable possibility to determine the differences between similar elements. In particular, the multiple evaluation techniques (the approach based on market, price and cost) are used if the required information is available with no additional costs or efforts.

The standard FASB specifies that level 3 of estimation entails a professional reasoning when choosing and applying the techniques and the important inputs. Furthermore, if multiple evaluation techniques are used, an analysis of the effect entailed by their use is also required, taking into account the relevance and the credibility of the inputs that are used. In order to become a genuine instrument for valuating assets and debts so as to estimate their fair value in the accounting records, the FASB project also provides, in its annexes, an implementation guide made of technical specifications related to valuation and examples.
Thus, one may conclude that, through its contents, the FASB project represents an important stage in understanding and applying the methodology of valuation meant for financial reporting. From this point of view, the project is more useful than the standards issued by the IASB and even the specifications of the valuation standard meant for this particular purpose, which was prepared by the IVSC.

4. The stance of European regulators towards fair value

The European Union itself has displayed a certain degree of concern with drafting and applying regulations with regards to fair value, so that it adopted part of the provisions of the international standards under the Directive of "fair value".

The European Union Directives do not provide a genuine conceptual framework. The IVth Directive, as issued in 1978, does establish, however, a series of principles that act as guideline when preparing financial statements.

These principles include the principle of nominalism or historical cost, according to which the variation of the purchasing power of the currency are not taken into account. However, member states were provided with ways around this provision (Raffournier B., 2000). Thus, it was possible to apply methods for adjusting financial statements to inflation (article 33). The method employed had to be described in notes. The difference arising from re-valuation was registered as own capitals, and its variation was analyzed. The businesses that opted for the principle of historical cost were not compulsorily expected to publish information on the effects of inflation.

In that which concerns valuation, the IVth directive referred to the precedence of historical cost (article 32), but allowed member states to authorize or impose other valuation bases (article 33). One may conclude that, in their initial form, European directives did not discuss fair value. Currently, they have been updated so as to convey the spirit of international accounting standards. Thus, the role of fair value was strengthened.

The IVth and VIIth Directives were amended in basis of the Directive of the European Parliament and Council no. 2003/51/CE date June-18th-2003. The updated version of these regulations allows that fair value be used for measuring asset categories other than financial instruments. This provision may be inapplicable only with consolidated accounts. The term of market value is replaced by fair value.

More specifically, if article 32 of the current updated version of the IVth directive requires that the elements of financial statements (annual accounts) be presented based on the principle of historical cost (purchase price or production cost), article 33 provides alternative standards for valuating fixed assets, which can be required or accepted by member states. Thus, the same article 33 also establishes the cases when it is acceptable not to use historical cost, and they are as follows:

- valuations based on the method of replacement value for tangible assets with limited life of economic use and for stocks
- valuations of elements of financial statements, including the capital and reserves, through other methods than that of the replacement value, when such methods are meant to take inflation into account
- the re-valuation of fixed tangible assets

The term of fair value is directly mentioned in section 7a, named "Valuation at fair value", of the current updated version or the IVth Directive. This section refers only to financial instruments, including derivatives, which can be valuated at the fair value by way of derogation from the principle of historical cost (article 42a). The permission thus granted to member states may be limited to consolidated accounts. The fair value must be determined by referring to:

- the market value, when a reliable market is identified.
- a value determined through generally accepted valuation models and techniques and which ensure a reasonable estimate of the market value, when a reliable market is not identified.

One may see that fair value is generally accepted as a benchmark for asset value, though it is not required that companies use fair value for their individual accounts. However, there is no mentioning of the means for estimating fair value, and there is only a suggestion that the market value should be taken into account, which is a major drawback in applying it. On the other hand, although they are not particularly encouraged to use fair value, member states may work on the concept and find or recommend methods for obtaining it.

Furthermore, the European Union's bias towards accounting convergence and fair value is more obvious in the case of European companies which, based on the European Regulation no. 1606 dated July-19th-2002, must submit their consolidated accounts in compliance with the IAS/IFRS, applicable beginning January-1st-2005.

5. Conclusions

We believe that reaching a common position on fair value measurement between IFRS and US GAAP is an important move towards achieving the objective of a single set of high quality accounting standards. We regards the ED issued by IASB as a positive step towards removing some of the differences between the two frameworks.

However, analyzing the exposure draft issued by IASB and the SFAS 157 issued by IASB, we consider that the main differences between those two are:

- ✓ The exposure draft issued by IASB proposes that a fair value measurement assumes that the transaction to sell the asset or transfer the liability takes place the most advantageous market to which the entity has access**.** SFAS 157 assumes that a transaction takes place in the principal market (or, in the absence of a principal market, the most advantageous market for the asset or liability).
- ✓ SFAS 157 explicitly defines that the unit of account for financial instruments within Level 1 valuations is the single financial instrument, which might give room for an assumption that within Level 2 or 3 valuations the unit of account could be a portfolio of financial instruments and adjustments are possible to a certain extent. In contrast the ED is silent on that point but according to the paragraph BC110 d) it means that IAS 39 specifies the unit of account as the single financial instrument for all levels of the fair value hierarchy. Thus there would be no room in IFRS for any adjustment, which might be critical.
- ✓ Unlike SFAS 157, which implicitly requires the recognition of day 1 gains or losses even if the fair value measurement uses unobservable inputs, the exposure draft defers to the relevant standards for the asset or liability to determine whether to recognise the gain or loss.
- ✓ ED exclude the financial instruments from the in-use valuation premise, in contrast to SFAS 157

We believe that the differences of the ED in comparison to SFAS 157 identified by the Board in paragraph BC 110 are not of a major relevance conceptually but might be of practical relevance to a certain extent. Therefore, we agree with the opinion of other authors (Mick Homan, Institute of Management Accountants) that the benefits of a fully converged standard are significant and outweigh any conceptual preferences that the IASB may perceive in the conclusions reached in the ED.

We also believe that the European Union's preference for accounting convergence and, implicitly, for accepting fair value is an important step to the increase in the quality and comparability of information provided by businesses through the financial statements.

In the end, we can only ask the question that the opponents of fair value have asked, in particular the Europeans (Casta J.F., Colasse B. & others, 2001): is an accounting regulation body, whether international, regional, or national, entitled to impose a certain valuation system for the elements of financial statements? The critics of fair value claim that it leads to a different image of the transactions and activities of a company than the one provided by the traditional system of historical cost, and, consequently, that the economic reality appears uncertain. However, the supporters of fair value would reply that this is exactly what an accounting regulator must do, to establish rules or treatments that leave no room for interpretation, do not provide too many working alternatives, thus ensuring the uniformity and comparability of the accounting information that is made public.

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