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June 18, 2010

Mr. Melson Darra
Acting General Manager
Pohnpei Port Authority
P.O. Box 1150
Kolonia, Pohnpei 96941

Dear Mr. Darra:

In planning and performing our audit of the financial statements of the Pohnpei Port Authority (the Authority) as of and for the year ended September 30, 2009 (on which we have issued our report dated June 18, 2010), in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, we considered the Authority's internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control over financial reporting.

Our consideration of internal control over financial reporting was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over financial reporting. However, in connection with our audit, we identified, and included in the attached Appendix I, deficiencies related to the Authority's internal control over financial reporting and other matters as of September 30, 2009 that we wish to bring to your attention.

We have also issued a separate report to the management, also dated June 18, 2010, on our consideration of the Authority's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters.

The definition of a deficiency is also set forth in the attached Appendix I.

A description of the responsibility of management for establishing and maintaining internal control over financial reporting and of the objectives of and inherent limitations of internal control over financial reporting, is set forth in the attached Appendix II and should be read in conjunction with this report.

This report is intended solely for the information and use of the management, others within the organization, and the Office of the National Public Auditor and is not intended to be and should not be used by anyone other than these specified parties.

We will be pleased to discuss the attached comments with you and, if desired, to assist you in implementing any of the suggestions.

We wish to thank the staff and management of the Authority for their cooperation and assistance during the course of this engagement.

Very truly yours,

Deloitte & Touche LLP

SECTION I – CONTROL DEFICIENCIES

We identified, and have included below, control deficiencies involving the Authority's internal control over financial reporting as of September 30, 2009 that we wish to bring to your attention:

1. Property and Equipment

Comment: In the course of examining property and equipment, we noted the following:

a. Acquisition costs for thirty-nine items acquired in prior years are below the Authority's established capitalization threshold of $300.

b. A used boat listed as having a Yamaha 70 HP engine, actually has a Yamaha 60 HP engine. The description in the fixed asset register was based on the purchase documents. Authority seaport personnel represented that the original engine was replaced.

Recommendation:

a. Management should comply with established capitalization thresholds.

b. The fixed asset register should be timely updated.

2. Revenue Recognition

Comment: In accordance with U.S. generally accepted accounting principles (GAAP), revenue is recognized when a transaction occurs, and the revenue is realized or realizable and earned. During fiscal year 2009, the Authority recorded $137,500 of revenues that relate to prior year dockage fee charges to an insolvent customer. No revenue should have been recognized due to the apparent inability of the customer to pay.

Recommendation: Revenues should be recognized in accordance with U.S. GAAP.

3. Operational Reports

Comment: Seaport and Airport operational reports are prepared on a monthly basis. The reports are not compared with actual results.

Recommendation: We recommend that operational reports, prepared independent of accounting, be compared with actual recorded information and discrepancies if any, be timely investigated. This matter has been reported in fiscal year 2007 and 2008 audits in our previous letters dated January 13, 2008 and April 24, 2009, respectively.

4. Issuance of Materials and Supplies

Comment: PPA received replacement parts and equipment from the AIP Grant. We observed that issuances and usage of these assets was not documented. Although the Authority can identify the whereabouts of the assets, a listing of assets used was not readily available. Further, the carrying values of the replacement parts as of September 30, 2009 are not shown on the schedule provided us.

Recommendation: It is a best practice to document issuance of replacement parts through an approved issuance slip to provide monitoring and accountability over equipment and supplies.

SECTION II – DEFINITIONS

The definition of a deficiency that is established in AU 325, *Communicating Internal Control Related Matters Identified in an Audit*, is as follows:

A *deficiency* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A deficiency in design exists when (a) a control necessary to meet the control objective is missing or (b) an existing control is not properly designed so that, even if the control operates as designed, the control objective would not be met. A deficiency in operation exists when (a) a properly designed control does not operate as designed, or (b) the person performing the control does not possess the necessary authority or competence to perform the control effectively.

MANAGEMENT'S RESPONSIBILITY FOR, AND THE OBJECTIVES AND LIMITATIONS OF, INTERNAL CONTROL OVER FINANCIAL REPORTING

The following comments concerning management's responsibility for internal control over financial reporting and the objectives and inherent limitations of internal control over financial reporting are adapted from auditing standards generally accepted in the United States of America.

Management's Responsibility

The Authority's management is responsible for the overall accuracy of the financial statements and their conformity with generally accepted accounting principles. In this regard, management is also responsible for establishing and maintaining effective internal control over financial reporting.

Objectives of Internal Control over Financial Reporting

Internal control over financial reporting is a process affected by those charged with governance, management, and other personnel and designed to provide reasonable assurance about the achievement of the entity's objectives with regard to reliability of financial reporting, effectiveness and efficiency of operations, and compliance with applicable laws and regulations. Internal control over the safeguarding of assets against unauthorized acquisition, use, or disposition may include controls related to financial reporting and operations objectives. Generally, controls that are relevant to an audit of financial statements are those that pertain to the entity's objective of reliable financial reporting (i.e., the preparation of reliable financial statements that are fairly presented in conformity with generally accepted accounting principles).

Inherent Limitations of Internal Control over Financial Reporting

Because of the inherent limitations of internal control over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may not be prevented or detected on a timely basis. Also, projections of any evaluation of the effectiveness of the internal control over financial reporting to future periods are subject to the risk that the controls may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.