Goode Investment Management, Inc.

904 Terminal Tower 50 Public Square Cleveland, OH 44113-2207

Letter of Comment No: //
File Reference: FSPAAGINVA

Date Received:

September 19, 2005

Mr. Lawrence Smith
Director of Technical Application and Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Re: File Reference FSP AAG INV-a, Reporting of Fully Benefit-Responsive Investment Contracts Held by Certain Investment Companies Subject to the AICPA Investment

Company Guide

Dear Mr. Smith:

We at Goode Investment Management, Inc., a registered investment advisor and certified minority business enterprise, wish to commend the FASB staff on the solid work it has done in preparing the FSP on the reporting of fully benefit responsive investment contracts. We also wish to add our voices to the insightful comments recently presented to you by the Stable Value Investment Association, of which we are a member. We concur in all of their requests for language changes to the FSP, with particular emphasis on the recommendations to amend paragraph 13, which seeks to exclude non-defined contribution plan assets from stable value investing. We recommend that FASB grant a grandfather arrangement to current non-defined contribution holders of stable value funds. Forcing such holders of stable value funds out of their current positions would have profound and negative effects not only of participants forced out of such funds, but also those left behind. The economic burden on both groups could create far more difficulties than the perceived risk of retaining the accounting conventions currently in place.

Thank you for the opportunity to comment on the FASB's good work.

Sincerely,

Bruce T. Goode

Bruce 7. Boode

President