

Frederic W. Cook & Co., Inc.

New York • Chicago • Los Angeles • San Francisco

January 25, 2006

Financial Accounting Standards Board  
401 Merritt 7  
P. O. Box 5116  
Norwalk, CT 06856-5116

Letter of Comment No: *H*  
File Reference: FSP123R-D

Attention: Director, TA&I-FSP

**Comments on Proposed FSP FAS 123(R)-d**

To Whom It May Concern:

In summary, we support the Board's tentative decision to develop a "probability" approach consistent with the classification guidance provided in footnote 16 of Statement 123(R). We see no need to restrict this guidance to specific types of contingent events (that is, the guidance should apply to *any* type of contingent event), and we believe the probability approach more appropriately addresses this issue than a "grandfathering" approach.

Thank you for your consideration.

Sincerely,



Thomas M. Haines