Letter of Comment No: 32 File Reference: 1050-001 Date Received: 4/11/02

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March 29, 2002

Mr. Timothy S. Lucas Director of Research and Technical Activities Financial Accounting Standards Board 401 Merrit 7 P.O. Box 5116 Norwalk, CT 06856-5116

Re: FASB Proposed Project - Issues Related to the Recognition of Revenues and Liabilities

Dear Mr. Lucas:

We appreciate the opportunity to comment on the FASB's proposed project "Issues Related to the Recognition of Revenues and Liabilities."

We would first like to reiterate our support for a revenue recognition project. Throughout last year, through our letters to the EITF in reference to revenue recognition issues, we have consistently stated that we believe the FASB should address these issues. We are, therefore, supportive of the FASB codifying current guidance in this area, inclusive of the numerous EITF issues and SEC Staff Accounting Bulletins to provide a bridge between the concepts and detailed guidance, with an aim to produce a single, concise authoritative accounting standard for revenue recognition.

We do, however, feel that due to the potential magnitude of this type of project, that revenues and liabilities should be addressed as two independent projects. Over the past year, detailed guidance relating to revenue recognition issues has been promulgated. Most resulted in companies restating prior-period financial statements. Since there are still two revenue recognition issues under discussion at the EITF, we believe that in order to streamline the possible restatement process, the FASB should focus at this time on the revenue recognition We believe the effective dates for implementing the remaining EITF revenue recognition issues should coincide with the implementation date for the final FASB statement.

If you have any questions related to this letter, please do not hesitate to contact Robin Ricci at (917) 663-2844 or me at (917) 663-4154.

Very truly yours,

Marie T. Gallagher Assistant Controller