Deloitte.

December 22, 2006



Mr. Lawrence W. Smith
Director TA&I – FSP
Financial Accounting Standards Board
P.O. Box 5116
Norwalk, CT 06856-5116

Re: Proposed FASB Staff Position No. FIN 46(R)-d: "Application of FASB Interpretation No. 46(R) to Investment Companies"

Dear Mr. Smith:

Deloitte & Touche LLP is pleased to comment on the proposed FASB Staff Position No. FIN 46(R)-d, "Application of FASB Interpretation No. 46(R) to Investment Companies" (the proposed FSP).

We commend the staff for reaching a conclusion, in such an expeditious manner, on the application of Interpretation 46(R) to companies that will apply the guidance contained in the AICPA's final Statement of Position, Clarification of the Scope of the Audit and Accounting Guide Investment Companies and Accounting by Parent Companies and Equity Method Investors for Investments in Investment Companies (the Guide).

We support the issuance of the proposed FSP as a final position of the FASB staff.

If you have any questions concerning our comments, please contact Randall Sogoloff at (203) 761-3777.

Yours truly,

Deloitte & Touche LLP

ce: James Johnson