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From: Alfred King [mailto:alfredking@adelphia.net]

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To: director@fasb.org

Subject: Intangibles project

Letter of Comment No: 1

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Tim, I strongly support adding to your agenda a project on Intangible Assets. Given the new rules in SFAS141 and 142 about identifiable intangibles, more and more questions are being raised by our clients on "What about our own intangible assets that are not on our balance sheet?"

If you form a steering committee of some sort I would appreciate the opportunity to work with you on such a working group. Our firm, Valuation Research Corporation, has had extensive experience in valuing virtually every type of intangible asset for purposes ranging from taxes through financial reporting to utilization by lenders as collateral, as well as in bankruptcy.

Best wishes,

Alfred