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

Dear Mr. Lucas:

In response to the FASB's recent request, we appreciate the opportunity to share our views on the two standard setting projects being considered by the FASB for inclusion on its agenda-reporting financial performance and disclosure about intangibles.

1. Reporting Information About the Financial Performance of Business Enterprises

We believe this project should be added to the FASB's agenda.

Significant diversity and illogical inconsistency is rapidly developing in reporting practice in Corporate America for pro forma or core operating earnings. The problem is receiving increased publicity in the financial media. Investors and other financial statement users will lose creditability in our financial reporting practices, and the abuses eventually will not be tolerated.

This is clearly an area where the FASB needs to step in before the SEC dictates a solution.

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The FASB's Proposal for this new agenda project discusses three alternative approaches that could be adopted for the project. We support following the first or so called minimum approach.

2. Disclosure of Information About Intangible Assets Not Recognized in Financial Statements.

We strongly urge the FASB not to undertake this project.

Intangibles present many practical problems that preclude producing additional useful information. Intangibles generally defy identification, measurement and valuation on a periodic reporting basis. Also, the correlation between periodic expenditures for intangibles and value received by the enterprise is usually indeterminate and varies widely between periods and enterprises.

We believe additional expanded disclosure information about intangibles would be of limited value to statement users and significant data gathering problems for statement preparers.

Very truly yours,

Norman P. Foster

NPF/dsb