



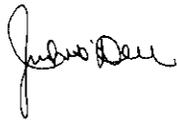
FASB Statement No. 107 and therefore many private companies will be drawn into the scope of the Proposed FSP, which the PCFRC assumes is not the intent of the FASB.

The PCFRC is not aware of any compelling private company financial statement user need for this type of information that justifies the significant departure from the FASB's normal deliberative due process. The financial reporting user representatives on the PCFRC do not believe that the proposed disclosures are needed to address any significant shortcomings in the information they utilize in making lending, investing, or bonding decisions.

Based on the foregoing, the PCFRC recommends that the disclosure requirements of the Proposed FSP be made applicable only to the industries and constituencies where these disclosures are needed. An option for the FASB to consider is exempting from the scope of the Proposed FSP private companies whose total assets are less than \$100 million on the date of the financial statements, including those private companies that have interest rate swap derivatives.

Please contact me if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Judith H. O'Dell". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

Judith H. O'Dell  
Chair  
Private Company Financial Reporting Committee