



McDonald's Corporation
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March 9, 2009

Mr. Russell G. Golden
Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
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LETTER OF COMMENT NO. 44

File Reference: Proposed FSP FAS 107-b and APB 28-a

McDonald's Corporation appreciates the opportunity to comment on the Financial Accounting Standards Board's proposed Staff Position No. FAS 107-b and APB 28-a, *Interim Disclosures about Fair Value of Financial Instruments* (the proposed FSP).

Although the recent instability in the financial markets has led to increased attention on the valuation of financial instruments, we believe that increasing the frequency of fair value disclosures for many non-financial institutions will not significantly improve the transparency, comparability, and quality of information provided to financial statement users.

For McDonald's, the main component of our annual FAS 107 disclosure relates to the fair value of our debt obligations. For the past three years, the fair value of our outstanding debt differed by no more than 2% from the carrying amount. Requiring this disclosure on a quarterly basis, rather than the current annual basis, would provide little or no additional benefit to users of our financial statements. Financial statement users of McDonald's (and other non-financial institutions) focus more on a company's ability to meet financial obligations (through cash provided by operations and other sources of cash), rather than focusing on the fair value of the obligations.

In addition to providing little incremental benefit to users of our financial statements, the operational issues of obtaining all the necessary information needed for a FAS 107 disclosure on a quarterly basis would be burdensome. For our annual disclosure, not only do we obtain specific information on all of our international subsidiaries' borrowings, we also obtain market quotes and indicative bank quotes to use in our pricing models and discounted cash flow analyses. The quarterly collection and analysis of the required data would require a significant amount of time and effort at a time when companies' resources could be better spent focusing on the significant economic issues facing them.

While we don't believe the proposed FSP would enhance financial reporting, if the decision is made to move forward, we believe the proposed FSP should be deferred to at least interim periods ending after June 15, 2009. This would provide companies with the time necessary to appropriately plan for the effort required. In addition, we do not believe it is necessary to repeat the methods and significant assumptions previously disclosed in companies' most recent annual financial statements unless there has been a significant change.

McDonald's appreciates the opportunity to express our opinion on this matter. We would be pleased to discuss our comments in greater detail if requested.

Sincerely,

/s/ Kevin M. Ozan
Kevin M. Ozan
Corporate Senior Vice
President - Controller