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LETTER OF COMMENT NO. 7

January 8, 2008

Russell Golden
Director, Technical Application and
Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
P. O. Box 5116
Norwalk, CT 06856-5116

Re: Proposed FASB Staff Positions FAS 157-a and FAS 157-b

Dear Mr. Golden:

The Committee on Corporate Reporting ("CCR") of Financial Executives International ("FEI") wishes to express its support for the two proposed FSPs related to FAS 157 (FSP FAS 157-a and FSP FAS 157-b). FEI is a leading international organization of senior financial executives. CCR is the senior technical committee of FEI, which reviews and responds to research studies, statements, pronouncements, pending legislation, proposals and other documents issued by domestic and international agencies and organizations. This document represents the views of CCR and not necessarily the views of FEI or its members individually. Our comments on each of these FSPs follow.

Proposed FSP FAS 157-a, Application of FASB Statement No. 157 to FASB Statement No. 13 and Its Related Interpretive Accounting Pronouncements That Address Leasing Transactions

CCR strongly agrees with the Board's decision to revise the scope of the standard to exclude leasing transactions. As we have indicated in our prior comment letters related to this topic, we believe that the effects of the new definition of fair value on the accounting for leasing transactions are both fundamental and pervasive. We agree that it would be best if those effects were addressed comprehensively as part of the Board's agenda project on leasing.

Proposed FSP FAS 157-b, Effective Date of FASB Statement No. 157

As previously indicated, while CCR would have preferred a full deferral of the standard, we agree that the most difficult implementation issues dealing with measurement and subsequent accounting relate to non-financial assets and liabilities, which typically do not have active markets upon which fair value measurements can be based. We therefore support the FSP as drafted and urge that the Board continue

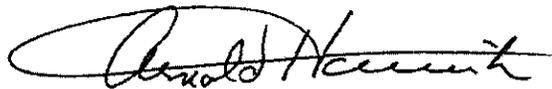
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to address significant outstanding implementation issues related to financial assets and liabilities as soon as practicable.

We appreciate the Board's prompt consideration of the underlying issues that led to issuance of these proposed FSPs and look forward to their finalization in the near future.

Sincerely,

A handwritten signature in black ink, appearing to read "Arnold Hanish". The signature is written in a cursive style with a large, sweeping initial "A".

Arnold C. Hanish
Chairman, Committee on Corporate Reporting
Financial Executives International