

Sent:

Thursday, March 26, 2009 2:22 PM

To:

Adrian Mills; Diane Inzano; Joseph Vernuccio; Kevin Stoklosa; Kristofer Anderson; Mark Trench;

Meghan Clark; Peter Proestakes; Russell Golden; Vita Martin; Wade Fanning

Subject: FW: File Reference: Proposed FSP FAS 157-e

From: Lee Cooper [mailto:lee.cooper@anderson.ucla.edu]

Sent: Thursday, March 26, 2009 2:07 PM

To: Director - FASB

Subject: File Reference: Proposed FSP FAS 157-e

Market to Market – a simple alternative.

Market to market account provides important transparency into the measure corporate value, but has obvious problems with frozen markets and/or downward spirals in valuation.

Alternative: Spit accounting for the assets of a firm into two classes. One class contains assets marked to market, while the other class has assets at book value. The total stated worth of a firm is the sum of the two classes, but investors can assess the risk of a firm according to the proportion of total stated worth in book-value assets.

Lee G. Cooper, Professor Emeritus UCLA Anderson School 330 - 23rd Street Santa Monica, CA 90402 Cell: 310.339.8036