October 8, 2009

LETTER OF COMMENT NO. 30

Russell G. Golden, FASB Technical Director
Financial Accounting Standards Board
401 Merritt 7
Norwalk, Connecticut 06856-5116

Re: Proposed FASB Staff Position - FAS 157-d

Dear Mr. Golden:

I appreciate this opportunity to respond to the proposed FASB Staff Position (FSP) amending FASB Statement No. 157, *Fair Value Measurements*. The Board and the FASB staff are to be commended for this prompt response to current domestic and global economic conditions and critics of "mark-to-market" accounting. Providing for an extremely shortened due process period clearly tells the financial community this is an issue the Board is willing to address directly and openly.

The proposed staff position amending through clarification FASB Statement No. 157 is appropriate and easy to understand. It will provide needed guidance to financial statement preparers in determining fair value when relevant observable data does not exist and when there an active market does not exist.

Additionally, I would like to applaud the Board for standing firm in their conviction that fair value disclosures (such as those required under Statement No. 157) provide transparency and useful information for decision making. The Board should continue to cooperate with and support the Securities and Exchange Commission in this area in an effort to continue to inform potential investors and creditors.

Again, I appreciate the opportunity to provide my comments on the above noted proposed staff position. Should you have any questions, please feel free to contact me at lkmdennis@cfl.rr.com or ldennis@bus.ucf.edu .

Sincerely,

*s/ Lynda M. Dennis*

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