

Mr. Russell G. Golden, FASB Technical Director
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PO Box 5116, Norwalk, CT 06856-5116
File Reference: Proposed FSP FAS 157-d



LETTER OF COMMENT NO.

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Dear Mr. Golden:

We appreciate the opportunity to comment upon FSP FAS 157-d. We believe this clarification by example fails to adequately address distressed prices resulting from inactive and disorderly markets. In addition, we believe there is now more confusion than clarity when compared to the SEC release of September 30, 2008.

Specifically, we believe there is a deficiency with respect to appropriate guidance related to liquidity premiums in disorderly markets.

We would request an amendment to A32D to include an example in the spirit of the following:

Entity A determines, in its judgment, that the liquidity premium has resulted from distressed or forced liquidation sales and accordingly did not result from orderly transactions. With respect to A32D(a), Entity A concludes that the liquidity premium in an orderly market is 100 basis points.

We would request an amendment to A32E to include an example in the spirit of the following:

Entity A concludes that to address the existence of disorderly inactive markets and distressed pricing, 17% is the point within the range that is most representative of fair value under the circumstances.

We believe A32F is inappropriately focused on *selling prices* in the *current market* versus a measure of fair value. Accordingly would request the following amendments:

In accordance with the requirements of Statement 157, Entity A has determined that the risk-adjusted discount rate appropriately reflects the reporting entity's best estimate of the assumptions that market participants would use in pricing to determine fair value of the asset in a current transaction to sell the asset at the measurement date. Risks include nonperformance risk (that is, default risk and collateral value risk) and liquidity risk (that is, the compensation that a market participant receives for buying an asset in an orderly market transaction that is difficult to sell under current market conditions).

Sincerely,

Dennis A. Starliper, CPA
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