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June 30, 2008



LETTER OF COMMENT NO.

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

Re: File Reference Proposed FSP FAS 133-b and FIN 45-c

Dear Mr. Golden:

We agree with the Board's observations that financial guarantee contracts that are covered by the disclosure requirements of FASB Interpretation No. 45, Guarantor's Accounting and Disclosure Requirements for Guarantees, Including Indirect Guarantees of Indebtedness of Others ("FIN 45"), have substantially similar risks and rewards to credit derivatives, and we support the Board's efforts to improve disclosures about credit derivatives that do not fall under the scope of FIN 45. Accordingly, we support the issuance of this Proposed FSP.

We are not aware of specific operational difficulties that would prohibit the achievement of the desired effective date, although we believe preparers are best equipped to address that comment request. The Board's willingness to allow the disclosure of internal credit categories to satisfy the "current status" disclosure requirement should help speed adoption. Another factor contributing to a speedy adoption is that preparers would likely be able to disclose notional amounts of contracts to address the "maximum potential amount of future payments that the seller could be required to make under the credit derivative."

We appreciate the opportunity to offer our comments and repeat our support for this project. We would be pleased to discuss these issues in more detail with the Board or staff at your convenience.

Sincerely,

Ernet + Young LLP