

IOWA CREDIT UNION LEAGUE

April 2, 2007

Technical Director
Financial Accounting Standards Board of the
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116



LETTER OF COMMENT NO. 13

Via E-mail: director@fasb.org

Re: Invitation to Comment – Valuation Guidance for Financial Reporting
File Reference No. 1520-100

Dear Sir or Madam:

We appreciate the opportunity to comment on the Financial Accounting Standards Board's (FASB) request for comment on whether additional and more specific valuation guidance is needed in financial reporting as well as the process for developing that guidance. The Iowa Credit Union League (the League) is the trade association representing 150 Iowa credit unions. The comments below are reflective of comments received from our member credit unions; please forward our comments on to FASB.

We believe there is a need for valuation guidance specifically for financial reporting, as credit unions have not historically been involved in valuation for financial reporting purposes and will need guidance on such. The valuation guidance should include some combination of conceptual valuation guidance and detailed implementation guidance. Furthermore, a permanent process should be established for valuation-guidance setting activities. This would ensure that guidance would be provided as new issues arise.

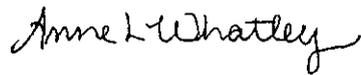
Existing appraisal organizations, such as preparers, auditors, regulators, and investors, should act as the principal standard-setters in establishing evaluation guidance for financial reporting. Many of these existing organizations have a better understanding of credit union operations than does FASB. Thus, the credit union community would be better served by these existing organizations acting as the principal standard-setters, rather than these organizations serving in some ancillary capacity to FASB.

Due process is necessary for any valuation guidance system that is adopted. Due process procedures should provide for the ability to appeal to a disinterested, outside third-party if a problem or disagreement arises.

Finally, our member credit unions continue to be concerned with some of the issues arising from FASB's forthcoming final guidance on business combinations. Specifically, they are concerned with the issue of determining market value and who determines market value. Either credit union in a merger has an interest in determining the market value, and one credit union's interest may be contrary to the other's. Furthermore, it may not be feasible for credit unions to hire an appraiser for such purpose.

Thank you for the opportunity to comment. Should you have any questions, please call me at (515) 221-3005.

Sincerely,

A handwritten signature in cursive script that reads "Anne L. Whatley".

Anne L. Whatley
Director of Regulatory Affairs
Iowa Credit Union League