



LETTER OF COMMENT NO. /

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-----Original Message-----

From: Sausmer, James [mailto:jsausmer@weiserllp.com]
Sent: Thursday, January 18, 2007 2:25 PM
To: Director - FASB
Subject: Valuation Guidance

Invitation to comment:

- Question 1. Yes. there is a need for valuation guidance specifically for financial reporting. The acceptable methods for business valuation that relate to financial reporting should be specified with clear examples of their calculation. This may include the income approach, asset approach and market approach.
- Question 1a. Valuation guidance should be specific with both conceptual and implementation guidance.
- Question 1b. Duration of valuation guidance should be no different than any other FASB. If new issues evolve, they must be dealt with.
- Question 2. The existing appraisal organizations should not have any formal level of participation in establishing valuation guidance for financial reporting. The FASB should include on its Board for valuation guidance, CPAs that have ABV and CVA designations. These individuals would have a good understanding of valuation issues and could reach out to the appraisal organizations if necessary.
- Question 3. The process should be that the FASB include on its Board for valuation guidance CPAs with ABV and CVA designations. 40% of the Board should have these designations.
- Question 4. The valuation guidance should be national, like the FASB.

FASB Guidance should only pertain to financial reporting under GAAP. It should not interfere with valuation methodology that exists through all the valuation organizations where the purpose is usually different than financial reporting.

Regards,
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