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January 16, 2008

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



LETTER OF COMMENT NO. 13

Re: File reference: Proposed FSP FAS 157-b, Effective Date of FASB Statement No. 157

Dear Mr. Golden:

PricewaterhouseCoopers LLP appreciates the opportunity to comment on proposed FASB Staff Position No. FAS 157-b, "Effective Date of FASB Statement No. 157" (the "proposed FSP").

We support the one-year deferral of the effective date of Statement 157 for nonfinancial assets and liabilities measured at fair value on a nonrecurring basis. We believe it will provide entities with the additional time necessary to address the implementation and measurement issues related to such assets and liabilities.

We appreciate the opportunity to express our views on the proposed FSP. If you have questions regarding our comments, please contact Tom McGuinness at (973) 236-4034 or John Horan at (973) 236-4997.

Sincerely,

PricewaterhouseCoopers LLP