
From: Susan Colladay [mailto:SColladay@tatetryon.com]
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To: Director - FASB
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To Whom It May Concern:

I would like to comment on paragraph 16 a) of the proposed staff position which requires that an entity would have to disclose each particular fund where the practical expedient method from paragraph 15 was used.

I have a client with a large portfolio of alternative investments (there are about 20 different hedge funds and private equity funds). I believe we would be able to use the practical expedient method of paragraph 15 for almost all of these funds. However, disclosing each of the funds individually in the footnotes would be more detail than users need (and I am not convinced that such detail would bring clarity to this client's financial statements).

Thus, I would like to suggest that paragraph 16 a) only require a summary level of detail regarding funds which use the practical expedient method of valuation.

Thank you for your consideration of my comment.

Best regards,

Susan E. Colladay, CPA

Partner, Audit and Assurance Services

Tate & Tryon

The Southern Building

805 15th Street, NW, 9th Floor

Washington, DC 20005

Email: scolladay@tatetryon.com

Tel: (202)-419-5112

Fax: (202)-293-2208

Visit our website at: <http://www.tatetryon.com>