



August 8, 2008

Via Email

Mr. Russell Golden Technical Director Financial Accounting Standards Board 401 Merritt 7 Norwalk, Connecticut 06856-5116

Re:

File Reference: No. 1600-100, Proposed Statement of Financial Accounting

Standards - Disclosure of Certain Loss Contingencies

Dear Mr. Golden:

CACI International Inc appreciates the opportunity to express its views on the Proposed Statement of Financial Accounting Standards, Disclosure of Certain Loss Contingencies, an amendment of FASB Statements No. 5 and 141(R) (the Proposed Standard). CACI International Inc (NYSE: CAI) is a leading provider of information technology and network solutions to the federal government. We provide innovative solutions to meet our government's needs in national security, intelligence, homeland security, and systems and policy transformation.

We support efforts to enhance financial reporting in a manner that provides financial statement users with better and more useful information. While we believe the intent of the Proposed Standard is based on such objectives, we are concerned with a number of its provisions that we believe will only provide users with more voluminous, but less meaningful, information. We also are concerned with the impact the Proposed Standard may have on ongoing or potential litigation, and with the costs that will be incurred to both implement and administer on an ongoing basis the requirements of this proposal. Our concerns are addressed more fully in the sections below.

Providing Quantitative Estimates of Loss Contingencies

We believe that the requirement to provide quantitative estimates of loss contingencies will not provide any meaningful information to financial statement users, and in fact may, in many instances, provide information that is misleading.

The Proposed Standard states that "an entity shall provide disclosures to assist users of financial statements in assessing the likelihood, timing, and amount of future cash flows associated with loss contingencies that are (or would be) recognized as liabilities in a

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Mr. Russell Golden August 8, 2008 Page 2 of 3

statement of financial position". Estimates of loss contingencies are very subjective and influenced by factors that are far too varied and far too many to recount here. By their nature they are inherently difficult to quantify with any degree of precision. Estimates of claim values by contending parties invariably cover wide ranges that fluctuate significantly during the course of legal proceedings and negotiations, and attempts to quantify the ultimate resolution at various points in time will provide users with estimates that will likely bear no resemblance to the final outcome, and estimates that may fluctuate widely during the proceedings or negotiations.

Given the premise that unreasonable estimates do not represent useful information, we believe that current accounting standards, and in particular Statement of Financial Accounting Standards No. 5, Accounting for Contingencies (FAS No. 5), provide for both adequate and meaningful disclosures of loss contingencies.

Disclosing Quantitative and Qualitative Factors Involving Litigation

One of our primary concerns with the Proposed Standard is the requirement to provide qualitative information about litigation, whether pending or ongoing. Disclosure of factors that are likely to affect the outcome of a contingency, factors affecting the amount of an outcome, management's qualitative assessment of the most likely outcome, and significant underlying assumptions to these factors and assessments, would only provide benefits to opposing parties. Also, despite the exemption provided for prejudicial information, we believe that even aggregated disclosures will serve to provide opposing parties with pertinent information that when used will only weaken our position in various matters.

We are also extremely concerned about the effects that the public disclosure of such information may have on our attorney-client privilege. By reporting key assumptions and assessments involving legal matters in a publicly filed document, we would likely be waiving attorney-client privilege covering critical information, thereby providing opposing parties with the means to request and obtain further information pertinent to our defense. We fail to understand how disclosure of such qualitative information is in the best interest of existing shareholders, and how such disclosure requirements allow management and board directors to fulfill their fiduciary responsibilities.

Incremental Costs to Comply with the Proposed Standard

If adopted, the Proposed Standard would require substantial incremental costs to both implement and administer on an ongoing basis. We currently commit significant management resources to ensure our fulfillment of disclosure requirements for contingencies under existing accounting standards, and we engage outside counsel, accountants, and subject matter and technical experts as deemed necessary to ensure we are providing the proper disclosures. The provisions of the Proposed Standard, and in particular its requirements to report quantitative estimates of loss contingencies, and to consider and potentially disclose information about contingencies for which the

Mr. Russell Golden August 8, 2008 Page 3 of 3

likelihood of loss is only remote, would significantly increase the costs and burden of complying with reporting and disclosure requirements involving loss contingencies. Considerable burdens would be placed on our resources in cases where contingencies arose just prior to our quarterly reporting dates, as our staff and outside experts would be required to carefully assess the potential loss of newly presented or discovered contingencies, even when the likelihood of loss is remote.

From a cost perspective, we also would expect increased exposure in the form of higher settlements. As discussed, we are concerned with the disclosures of qualitative information about legal matters, and believe that such disclosures will only provide strength to opposing parties. With this pertinent information, opposing parties will only demand, and likely receive, higher awards and settlements. These costs could far outweigh the administrative costs of just complying with the reporting and disclosure requirements.

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Given the issues we have put forth above, we recommend that the Financial Accounting Standards Board (the FASB) forego issuance of the Proposed Standard and instead retain FAS No. 5. The Proposed Standard would not provide the meaningful cash flow information that certain investors have requested, would expose corporations following U.S. generally accepted accounting principles to greater risks of litigation, and would not be beneficial to existing shareholders. If it continues to move ahead with a revision to FAS No. 5, we suggest that the FASB delay such adoption for at least one year, and consider amending FAS No. 5 concurrently with the move to converge U.S. standards with the more principled-based international standards.

We thank you for the chance to provide comments on this matter. If you should have any comments or questions regarding the points presented herein, please contact me directly at (703) 841-4488

Sincerely,

CACI International Inc

Thomas A. Mutryn

Executive Vice President,

Thomas A. Mentages

Chief Financial Officer & Treasurer