## **PERRY ELLIS INTERNATIONAL**

PEORCE FELDENICREIS
CHARMAN AND
CHIEF ENECUTIVE OFFICER



LETTER OF COMMENT NO. 84

August 7, 2008

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

Re: File Reference Number 1600-100

Dear Director:

We are pleased to take the opportunity to comment on the Exposure Draft, Disclosure of Certain Loss Contingencies, an amendment of FASB Statements No. 5 and 141(R) (the "Proposed Amendments").

We support FASB's goal of improving the transparency, timeliness and usefulness of financial information that is disclosed to investors. However, we have a fundamental concern that the Proposed Amendments may prove impractical, prejudicial and potentially harmful to current investors and a disservice to businesses. Litigation by its nature, is adversarial and can be highly unpredictable. The Proposed Amendments, as written, may require businesses to speculate and form unwarranted assumptions rather than provide investors reasonable clarity.

The American Bar Association, Ernst & Young and numerous businesses have submitted comment letters regarding the Proposed Amendments which we ask that you also take into consideration.

Thank you for considering our views on this critical subject. Please call me at (305) 873-1304 if you have any questions regarding this letter.

George Feldenkreis

Chairman of the Board and Chief Executive Officer