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February 18, 2008

Mr. Russell G. Golden
Director of Technical Application and Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116
File Reference: Proposed FSP FAS 157-c

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Submitted via email to: director@fasb.org

Re: Measuring Liabilities under FASB Statement No. 157 ("SFAS 157")

Dear Mr. Golden:

The Hartford Financial Services Group Inc. ("The Hartford" or "The Company") appreciates the opportunity to comment on the Proposed FSP FAS 157-c, Measuring Liabilities under FASB Statement No. 157 (the "Proposal"). The Hartford considers the Proposal to be very relevant in fair valuing liabilities that have no quoted prices in an active market, in particular the Company's guaranteed living benefits that are accounted for as embedded derivatives under FASB Statement No. 133, Accounting for Derivative Instruments and Hedging Activities. The Hartford believes that the Proposal does not change the overall exit price measurement objective of SFAS 157 but instead clarifies how a reporting entity might determine fair value under SFAS 157 in the absence of a quoted price for the identical liability in an active market. The Hartford suggests that additional wording, as described below, be provided within the Proposal, to clarify the factors that the reporting entity should consider in developing the amount that it would receive as proceeds if it were to issue the liability at the measurement date. The Hartford believes that such wording would improve financial statement comparability.

Suggested clarification to factors considered when determining proceeds

In addition to nonperformance risk, The Hartford suggests that additional wording be added to clarify that the reporting entity should consider other factors, such as risk margins for unobservable inputs, in its determination of the proceeds the reporting entity would receive if it were to issue the liability at the measurement date. The Hartford believes without this suggested clarification, expected issuance proceeds could be significantly different than an exit price for certain liabilities, such as the Company's aforementioned embedded derivatives, which would impair comparability.

In summary, The Hartford believes that the Proposal would improve financial reporting if the suggested clarifications are made. We would be happy to discuss our comments, in more detail, with the Board or its staff. Please feel free to call me at (860) 547-4135 if you have any questions regarding this response.

Sincerely,

Beth A. Bombara

Senior Vice President and Controller/CAO The Hartford Financial Services Group, Inc.

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