## McGladrey & Pullen

**Certified Public Accountants** 



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July 14, 2008

Mr. Russell Golden Technical Director Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

RE: Proposed FSP FAS 133-b and FIN 45-c

Dear Mr. Golden:

We are pleased to comment on the proposed FASB Staff Position (FSP) No. FAS 133-b and FIN 45-c, Disclosures about Credit Derivatives and Certain Guarantees: An Amendment of FASB Statement No. 133 and FASB Interpretation No. 45.

We support the proposed FSP as we agree it will achieve the Board's objective in improving disclosures about credit derivatives and guarantees. We offer the following comments for consideration:

- Paragraph 10.a. requires disclosure of "the current status of the payment/performance risk of the credit
  derivative" for each statement of financial position presented. The term "current status" is vague. We are
  unclear as to whether the Board intends the current status to be as of the financial statement date, the date
  of the report or another date. We also fail to understand the benefits of comparative disclosure for this
  information. We recommend clarification of the terminology and removal of the comparative requirement.
- We recommend changing the proposed FSP's effective date to coincide with FASB Statement No. 161, Disclosures about Derivative Instruments and Hedging Activities. Therefore the effective date would be for interim periods beginning after November 15, 2008.

We would be pleased to respond to questions the Board or its staff may have about any of the foregoing comments. Please direct any questions to Jay D. Hanson (952-921-7785) or Jolene M. Hart (952-921-7735).

Sincerely,

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