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April 13, 2007

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

Re: Invitation to Comment – Valuation Guidance for Financial Reporting File Reference No. 1520-100

Dear Sir or Madam:

The Georgia Credit Union League (GCUL) appreciates the opportunity to respond to the Financial Accounting Standards Board's (FASB) Invitation to Comment (Invitation) on whether additional and more specific guidance is needed in financial reporting as well as the process for developing that guidance. As a matter of background, GCUL is the state trade association and one member of the network of state leagues that make up the Credit Union National Association (CUNA). GCUL serves approximately 185 credit unions that have over 1.7 million members. This letter reflects the views of our Regulatory Response Committee, which has been appointed by the GCUL Board to provide input into proposed regulations such as this.

Summary of GCUL's Position:

This Invitation is of importance to credit unions because of the pending final guidance from FASB regarding the business combinations for mutuals. When issued, that guidance will implement the FASB merger rule that will eliminate the pooling-of-interests method of accounting and replace it with the acquisition method. Use of the acquisition method will require the acquiring credit union to measure and recognize the fair value of the assets and liabilities of the acquired credit union at the time of the acquisition. Any new valuation guidance FASB may issue in the future could have an impact in a merger on a continuing credit union's balance sheet.

GCUL supports valuation guidance specifically for financial reporting. We believe the guidance should be specific and provide examples for use by preparers during implementation.

We believe FASB should be the entity that determines the standards for the valuation guidance. This should be done, however, with the assistance of industry experts experienced in the appraisal process.

We believe the process of valuation guidance should be conducted on a national basis. While international developments are important and should be monitored and addressed with the International Accounting Standards Board when necessary, we feel that in order for the valuation guidance to be of value and assistance to preparers, the guidance should be specific to U.S. financial statements.

Of particular importance to us is the effect the guidance can have on smaller entities such as credit unions. Many small credit unions have limited resources and lack the expertise needed to comply and may need additional time in order to do so. We encourage FASB to address these concerns in any guidance that is issued.

Thank you for the opportunity to comment. If you have questions about our comments, please contact Cynthia Connelly or me at (770) 476-9625.

Respectfully submitted,

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Richard Ellis

Vice President/Credit Union Development

Georgia Credit Union League