The World Bank

INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT INTERNATIONAL DEVELOPMENT ASSOCIATION

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November 25, 2008



LETTER OF COMMENT NO. 3

Technical Director Financial Accounting Standards Board 401 Merritt 7, PO Box 5116 Norwalk, CT 06856-5116 U.S.A.

Re: Proposed Statement of Financial Accounting Standards Subsequent Events, File Reference No. 1640-100

Dear Sir/Madam:

We appreciate the opportunity to respond to your request for comments on the proposed statement of Financial Accounting Standards, *Subsequent Events* (Proposed Standard). Overall, we support the Proposed Standard and believe that it will achieve the stated objectives among which, notably, to clarify management's role in the assessment of subsequent events. In this regards, we support the proposal of disclosing the date through which the assessment of the subsequent events has been made by management. However, we would also like to propose a minor terminology modification in conjunction with Issue No. 1, namely, the identification of the date of when financial statements are considered to be issued by the companies that <u>do not</u> file their financial statements with the U.S. Securities and Exchange Commission.

The current proposal identifies such a point of time with the term "financial statements are available to be issued" (Paragraph 6 of the Proposed Standard). We believe that this terminology may be confused with the terminology for when the financial statements of public companies are considered issued ("financial statements are issued", Paragraph 5 of the Proposed Standard). Because of the similarity in terms, the term "financial statements are available to be issued" may be mistakenly taken as the sequential step preceding the date of when "financial statements are issued", which in fact identifies an entirely different event and context. In order to eliminate any potential for confusion, we would like to propose a different term for the date when financial statements are considered to be issued by non-public companies as the date when "financial statements are available to be distributed".

Please do not hesitate to contact us should you have any questions or need clarifications.

Sincerely,

Charles A. McDonough

Deputy Controller The World Bank