

June 14, 2007

LETTER OF COMMENT NO. 49

Technical Director—File Reference Number 1530-100 FINANCIAL ACCOUNTING STANDARDS BOARD 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

Dear Sir or Madam:

For more than 25 years I have been a Pennsylvania lawyer. My practice focused on representation of local governments and school boards. I was Solicitor to large municipalities, a School Board Solicitor and Chief Negotiator.

In my municipal law work I had occasion to be involved in municipal finance issues. With that in mind, I write now to encourage you to enact the proposed new standards for the Financial Guarantee industry.

With the industry insuring bonds for municipalities totaling billions of dollars, it's important for local governments to have a clear unambiguous picture of the financial health of those insurers. Your proposed standards will more accurately reflect revenue and loss thus providing a more sound understanding of the relative health of the various firms.

Please act promptly to enact the proposed changes.

Very truly yours,

CHARLES R. GEROW

CRG:tbm