From: Imran Vanker [mailto:vanker@un.org] **Sent:** Monday, October 06, 2008 7:36 PM

To: Director - FASB

Subject: Proposed FSP FAS 157-d



LETTER OF COMMENT NO.

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Good day,

I refer to this Staff position recently circulated for comment.

The guidance is generally of a good quality, and is timely and I am in agreement with it.

Having given attention to the valuation when the market is inactive, would it not be useful to recommend that such 'inactive' market assets/investments be disclosed on the face of the balance sheet, as a separate line item? This would then emphasise the 'special conditions' attached to these assets.

Would it be possible to supplement this position with a second example, portraying a little more complex situation, and also showing how subsequent reversals would be treated.

Sincerely,

Imran.

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