From:
 Dan E. Butt

 To:
 Director - FASB

 Subject:
 Proposed FSP FAS 157-q

Date: Wednesday, June 24, 2009 3:15:47 PM



Via Email director@fasb.org

Re: Proposed FSP FAS 157-g

H.E. Butt Grocery Company (the "Company") is a privately held company based in San Antonio, Texas. It maintains the H-E-B Brand Savings and Retirement Plan and Trust, a qualified defined contribution plan (the "Plan"), for the benefit of its 70,000 employees.

The Plan holds interests in various alternative investment funds (the "Funds"). Due to diversity considerations, the Plan currently has investments in more than 70 such Funds. The selected Funds have various vintages and investment themes and hold numerous underlying portfolio investments.

Each of the Funds is an investment company that calculates net asset value (or partners' capital value) in accordance with the AICPA Audit and Accounting Guide, inclusive of FASB Statement No. 157.

The Company is a <u>strong</u> supporter of Proposed FASB Staff Position No. FAS 157-g allowing for the use of net asset value (or partners' capital value) without adjustment as determinative of fair value under FASB Statement No. 157.

It would be extremely <u>difficult</u> and <u>costly</u> for the Plan to re-value each of its many interests in the Funds by employing outside professionals to adjust net asset value (or partners' capital value). Any such adjustments would be speculative at best and have the potential of being benchmarked against distressed transactions. The sponsors of the Funds are best suited to determine valuation of the underlying assets of their Funds. Moreover, the Plan is a long-term holder of the Funds with ample liquidity to avoid any distressed liquidations.

We commend FASB for the thoughtful and reasonable approach being recommended in Proposed FASB Staff Position No. FAS 157-g.

Sincerely,

H.E. Butt Grocery Company