From: Mark Landstrom [mailto:mark@cogswellrealty.com]

Sent: Thursday, December 09, 2010 8:48 AM

To: Director - FASB **Cc:** Sylvester Giustino

Subject:

Good morning!

I wish to voice my opposition to new lease accounting rules that are under consideration by the Financial Accounting Standards Board (FASB). The proposed changes would move the cost of operating leases from a disclosure in the footnotes onto the balance sheet. Ramifications of the proposed changes could prove harmful to the commercial real estate industry. BOMA, along with others believes, FASB/IASB need to take more time to ensure the final standard is sound and thoroughly vetted.

Attached, please see a letter from the Leasing Accounting Coalition that makes the argument very well why these changes would severely harm our industry.

I respectfully ask that you consider these points before making any changes.

Thank you!

Lease Accounting Coalition Comment Letter