March 2, 2009

Technical Director
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, Connecticut 06856-5116

RE: Proposed FASB Staff Position FAS 107-b and APB 28-a, “Interim Disclosures about Fair Value of Financial Instruments” (File Reference: Proposed FSP FAS 107-b and APB 28-a)

Dear Technical Director:

We appreciate the opportunity to respond to the proposed FASB Staff Position FAS 107-b and APB 28-a, “Interim Disclosures about Fair Value of Financial Instruments” (the “proposed FSP”). We support the Board’s objective of improving the transparency and quality of information provided to financial statement users by increasing the frequency of the disclosures about fair value of financial instruments.

We agree that the proposed disclosures should apply to all financial instruments currently included within the scope of FASB Statement No. 107, Disclosures about Fair Value of Financial Instruments (“Statement 107”), and we agree that the proposed disclosures should be applicable for all entities covered by Statement 107. However, the proposed FSP should clarify how an entity should apply the guidance in FASB Statement No. 126, Exemption from Certain Required Disclosures about Financial Instruments for Certain Nonpublic Entities (“Statement 126”). Statement 126 states that if certain criteria are met, the fair value disclosures prescribed in Statement 107 related to financial instruments are optional for that entity. Since Statement 126 requires that an entity apply the criteria set forth in that Statement to the most recent year presented in comparative financial statements, the proposed FSP should clarify whether the Board intends for this evaluation to be performed for each interim period or only on an annual basis.

In addition, we agree with the effective date and transition included in the proposed FSP, but we suggest that the Board carefully evaluate preparer’s comments related to the practicability of the effective date.
We would be happy to further discuss the specifics of these issues in more detail at the request of the Board or the staff. If you have any questions about our comments or wish to discuss any of the matters addressed herein, please contact Enrique Tejerina at (212) 909-5530.

Sincerely,

KPMG LLP