September 2, 2004

## VIA EMAIL

File Reference: 1201-100 Date Received:

Letter of Comment No: 13

Director

File Reference No. 1201-100

RE:

Exposure Draft. Proposed Statement of Financial Accounting Standards.

Fair Value Measurements

June 23, 2004 Date:

Comments Submitted By: Accounting and Auditing Standards Committee -Society of Louisiana Certified Public Accountants - Jodie Arceneaux, CPA

## General Comments:

I believe the board has done a good job of defining and illustrating the methods for measuring fair value and expanded disclosure requirements.

## Specific Comments:

Issue 1: I believe entities will be able to consistently apply the fair value measurement objective using this guidance.

Issue 2: I believe the guidance provided in Appendix A is sufficient for using present value techniques to estimate fair value.

Issue 3: I believe that the guidance provided defining active markets is sufficient.

Issue 4: I believe the guidance provided in Appendix B for selecting the valuation premise that should be used is well defined with appropriate examples.

Issue 5: I believe the guidance provided in Appendix B for establishing the inputs needed for valuation techniques is adequately defined.

Issue 6: I believe the guidance provided in Appendix B for selecting the appropriate reference market is sufficient.

Issue 7: I believe that bid and asked prices should be used instead of closing prices if readily & regularly available.

Issue 8: I agree with the board that blocks should be used for large positions of securities. Approaches for defining a block should consider the facts and circumstances providing evidence of the entity's intent to transact in the block market. Using an individual trading unit in this case could result in distorted and misleading reporting.

Issue 9: I believe the guidance in Appendix B is sufficient for applying multiple valuation techniques.

Issue 10: Providing that there is a means of determining identical unrestricted securities, I believe the guidance in Appendix B is sufficient.

Issue 11: I agree that the disclosures would improve the quality of the financial statements.

Issue 12: I agree with the effective date.

Issue 13: No recommendation for additions.

Issue 14: I cannot attend the public meeting.

Very truly yours,

Jodie Arceneaux, CPA Accounting and Auditing Standards Committee Member