United Technologies Corporation United Technologies Building Hartford, CT 06101 (860) 728-6236



Margaret M. Smyth Vice President, Controller

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Submitted via email (to director@fasb.org) and ordinary mail



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

Reference: Proposed FSP FAS 107-b and APB 28-a

United Technologies Corporation (UTC) welcomes the opportunity to share its views on the proposed FASB Staff Position 107-b and APB 28-a "Disclosures about Certain Financial Assets" (the proposed FSP). UTC is a \$60 billion global provider of high technology products and services to the building systems and aerospace industries, operating in 186 countries around the world.

We support the Board's proposal requiring disclosures about the fair value of financial instruments on an interim and annual basis. However, as stated in our comments in Attachment A to this letter, we believe a more reasonable effective date for this proposal is for interim and annual periods ending after June 15, 2009. We believe this will allow adequate time to make required changes to systems to collect and value this information on a quarterly basis.

We thank the Board for its consideration of our views and would be pleased to discuss these issues in more detail with the Board members or the FASB staff at your convenience.

Sincerely,

Margaret M. Smyth Vice President, Controller

United Technologies Corporation

1. Do you agree that the proposed disclosures should apply to all financial instruments currently included within the scope of Statement 107? If no, which financial instruments do you propose should be included within the scope of this proposed FSP?

Yes, we believe that these disclosures should only apply to those financial instruments included in the scope of Statement 107. The FASB should not expand the scope beyond what is covered in Statement 107.

2. Do you agree that the proposed disclosures should be applicable to all entities covered by Statement 107? If not, which entities do you propose should be exempt from the proposed additional interim reporting requirements?

Yes, we believe the proposed disclosures should be applicable to all entities currently covered by Statement 107.

3. Are the proposed requirements to disclose fair value information for all interim and annual reporting periods ending after March 15, 2009, operational? If not, what would be an appropriate effective date? Why?

We do not believe that the proposed requirements to disclose fair value information for all interim and annual reporting periods ending after March 15, 2009 are operational. A more reasonable effective date would be for interim and annual reporting periods ending after June 15, 2009. Extending the effective date will allow for appropriate changes to be made to systems used to collect and value this information.

4. Are the proposed requirements to disclose the method(s) and significant assumptions used to estimate the fair value for all financial instruments for all interim periods subsequent to initial adoption operational? Why or why not?

Yes, we believe that the requirement to disclose the method(s) and significant assumptions used to estimate fair value for all financial instruments is operational.