Grant Thornton &

February 18, 2008

Mr. Russell G. Golden
Director of Technical Application and Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116



Via E-Mail to director@fasb.org

File Reference: Proposed FSP FAS 157-c

Grant Thornton LLP appreciates the opportunity to comment on the proposed FASB Staff Position FAS 157-c, "Measuring Liabilities under FASB Statement No. 157."

We support the Board's efforts to clarify how an entity would determine the fair value of a liability in the absence of a market to transfer the liability to a market participant. We believe that the proposed FSP will result in more consistent application of FASB Statement 157, Fair Value Measurements, when entities measure the fair value of liabilities. However, we suggest that the proposed FSP and the proposed amendment to Statement 157 clearly articulate that in the absence of a quoted price for the identical liability in an active market (Level 1 input) that the reporting entity would then consider Level 2 inputs, such as quoted prices for similar liabilities in active markets and quoted prices for identical or similar liabilities in markets that are not active, before applying the proposed guidance in paragraph 7 of proposed FSP FAS 157-c. We believe that there are many debt securities that have quoted prices in markets that are not active (Level 2 input) that reporting entities would use as inputs in measuring fair value of a liability. In our view, adding language about Level 2 inputs will more clearly guide users through the fair value hierarchy when measuring the fair value of a liability and would improve the proposed FSP.

175 West Jackson Blvd. 20th Floor Chicago, IL 60604-2615 T 312-856-0200 F 312-565-4719 Www.grantthornton.com

Grant Thornton LLP
US member of Grant Thornton International

Grant Thornton 75

We appreciate the opportunity to comment on the proposed FSP and would be pleased to discuss our comments with Board members or the FASB staff. If you have any questions, please contact Joseph Graziano at (732) 516-5560 or Mark Scoles at (312) 602-8780.

Very truly yours,

/s/ Grant Thornton LLP

175 West Jackson Blvd.
20th Floor
Chicago, IL 60604-2615
T 312-856-0200
F 312-565-4719
W www.grantthornton.com

Grant Thornton LLP US member of Grant Thornton International