

MINUTES



To: Board Members

From: Donoghue (ext. 374), Cizek (ext. 354)

Subject: Minutes of the July 18, 2007 Board Meeting—Transfers with Repurchase Financing Agreements: Comment Period **Date:** August 1, 2007

cc: MacDonald, R. Golden, Bielstein, Leisenring, Lott, 140 Project Team, Chookaszian, Polley, Gabriele, Allen, Sutay, Jacobs, FASB Intranet

The Board meeting minutes are provided for the information and convenience of constituents who want to follow the Board's deliberations. All of the conclusions reported are tentative and may be changed at future Board meetings. Decisions become final only after a formal written ballot to issue a final Statement, Interpretation, or FASB Staff Position.

Topic: Transfers with Repurchase Financing Agreements: Comment Period

Basis for Discussion: Board Memorandum 78, dated July 12, 2007

Length of Discussion: 10:45 to 11:00 a.m.

Attendance:

Board members present: Herz, Batavick, Crooch, Linsmeier, Seidman, Smith, and Young

Board members absent: None

Staff in charge of topic: Donoghue, Zecher

Other staff at Board table: None

Outside participants: None

Summary of Decisions Reached:

The Board discussed a proposed change to the comment period deadline related to FASB Staff Position (FSP) FAS 140-d, "Accounting for Transfers of Financial Assets and Repurchase Financing Transactions." The Board decided that the comment period should be extended by two weeks from the previous planned date of August 31, 2007 to September 14, 2007.

Objective of the Meeting:

The objective of the meeting was for the Board to discuss a proposed change to the comment period deadline that had previously been decided at the June 13, 2007 meeting.

Matters Discussed and Decisions Reached:

COMMENT PERIOD

1. Ms. Donoghue opened the discussion by stating that some Board members had expressed concern about the previous decision to end the comment period for the proposed FSP on August 31, 2007. The staff recommended that the Board maintain the comment deadline because it allows for approximately six weeks for constituents to respond while keeping the project on a schedule to allow for a November 15, 2007 effective date.

2. Mr. Smith stated that the planned comment period would not allow constituents enough time to respond to the proposed FSP that would require a major change in practice. Specifically, he pointed out that many affected individuals may not be available during the month of August due to vacations.

Ms. Seidman supported Mr. Smith's concern stating that she questioned whether August 31, 2007 would afford enough time for constituents to adequately respond because the proposed FSP appears to be affecting more entities than we initially identified.

3. Mr. Linsmeier questioned how the proposed deadline would influence the effective date of the FSP.

Mr. Herz responded that broker-dealer companies and others with a fiscal year ending November 30, may be precluded from implementing the standard in fiscal year 2008 due to a later than expected January 1, 2008 effective date.

4. Ms. Donoghue stated that constituents had previously asked that the issues within this FSP be addressed quickly.

Ms. Seidman restated her view that timing concerns should not overshadow the need to give respondents enough time to understand the effects of the FSP and comment accordingly.

5. Mr. Smith stated that respondents would need more time because of the systems requirements that the FSP may require. In drafting their comments respondents may need time to contact individuals in their systems department to understand the systems requirements for implementation.

6. Mr. Young stated that affected parties of the FSP have already closely followed the progress of this project. As such, the amount of time required to analyze the proposed FSP need not be unusually extended. Mr. Young also suggested that the comment period should remain as initially set and that the deadline should be readdressed if there were to be extension requests by the constituent community.

Mr. Herz stated that some Board members seemed to anticipate that there is a likely chance that respondents would request such an extension. Ms. Seidman, Mr. Smith, and Mr. Batavick all expressed agreement with this statement.

7. The Board voted to extend the comment period deadline to September 14, 2007.

Follow-up Items:

None.

General Announcements:

None.