

LETTER OF COMMENT NO.

Subject: FW: Reference: Proposed FSP FIN 48-d

From: Peter Kennedy [mailto:PKennedy@CoverRossiter.com]

Sent: Wednesday, May 27, 2009 10:32 AM

To: Director - FASB

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Thank you for allowing us the opportunity to comment on the proposed FSP. We audit many nonprofit organizations and our comments are restricted to the affect of the proposed FSP on those entities.

In general, we agree with the decision not to impose the disclosure requirements of paragraph 21(a) and 21(b) of FIN 48 on nonprofit organizations. The goal of clarity in disclosures is not served by the addition of mindless boilerplate language which only clutters the financial statements, diluting and obscuring more meaningful information within the footnotes. With that in mind, we believe it would make sense to also remove paragraph 21(e) of FIN 48 from the "all entities" required disclosures.

Very respectfully, Peter S. Kennedy, CPA Audit Director Cover & Rossiter, P.A. Wilmington, Delaware



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