From: Steve Lawson [mailto:selawson@lawsoncompanies.com]

**Sent:** Monday, June 10, 2013 11:41 AM

To: Director - FASB

Subject: File Reference No. EITF-13 - Accounting for Investments in Qualified Housing Projects

Technical Director, FASB

File Reference No. EITF-13 - Accounting for Investments in Qualified Housing Projects

Dear Sir or Madame:

I am a developer of affordable housing using the Low Income Housing Tax Credit (LIHTC) program, and offer the following comments with respect to EITF-13, Accounting for Investments in Qualified Housing Projects.

The current accounting rules cause concern among potential investors which impacts their decision to invest in Low Income Housing Tax Credits. The proposed change will specifically address these concerns. I agree wholeheartedly that the proposed change to the effective yield method (or preferably a ratable amortization method) is an appropriate method of accounting, whereby investors report the costs, along with the Low Income Housing Tax Credits, on the tax line.

The proposed change will be an improvement in the accounting, making it clearer and more neutral, which will make these investments more understandable to the investment community. This change will attract more investment capital to affordable housing and further strengthen the LIHTC program, which is an indispensable tool in addressing the shortage of available affordable housing across the nation.

Yours truly,

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