

July 8, 2009

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

Proposed FSP FAS 157-g

"Estimating the Fair Value of Investments in Investment Companies That Have Calculated Net Asset Value per Share in Accordance with the AICPA Audit and Accounting Guide, Investment Companies"

We appreciate the opportunity to comment on the above proposal. BB&T Corporation and its subsidiaries offer full-service commercial and retail banking and additional financial services such as insurance, investments, retail brokerage, corporate finance, treasury services, international banking, leasing and trust.

We support the FASB on its efforts to improve financial reporting. We are in general agreement with the proposed accounting. However, the effective date should be deferred until annual periods ending after December 15, 2009. We believe it is unreasonable to require additional disclosures without allowing sufficient time to establish appropriate mechanisms and controls to ensure accurate disclosures can be made.

We would be pleased to discuss our comments with the Board members or the FASB staff at your convenience.

11**11 14/**1/1/1

Very tru

Senior Accounting Policy Manager

Sturkie, III