From: <u>Haber, Jeffry</u>
To: <u>Director - FASB</u>

Subject: File Reference No. 1830-100

**Date:** Thursday, August 05, 2010 10:44:17 AM

Question 8: Are there alternative disclosures to the proposed measurement uncertainty analysis that you believe might provide users of financial statements with information about the measurement uncertainty inherent in fair value measurements categorized within Level 3 of the fair value hierarchy that the Board should consider instead? If so, please provide a description of those disclosures and the reasons why you think that information would be more useful and more cost-beneficial.

The heirarchy of the three levels of fair value disclosure provide users with a sense of how variable the valuations might be at a balance sheet date. The third level is notification to the financial statement user that the valuations used for the assets in this category are subject to unobservable inputs, essentially model based, and depending upon one's assumptions, can vary widely. That is implicit in being categorized as level 3.

The chart provided in the proposal of how the disclosure might look is fairly simple and basic - if limited to this, it might be useful to financial statement users. If disclosures are to be required regarding which variables were adjusted, by how much, the rationale for the adjustment as well as detailing why other variables were not adjusted, etc. then I would think the proposal provides little incremental information at a high cost.

Given that level 3 assets, by definition, have fair values that are dependent upon assumptions made within a model I wonder why there needs to be anything else said.

Sincerely.

Jeffry Haber

Jeffry Haber, PhD, CPA Professor and Chair Accounting Department Hagan School of Buisness Iona College