



Consumer Federation of America



October 15, 2008

Mr. Christopher Cox
Chairman
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Dear Chairman Cox:

We are writing to express grave concern regarding recent calls for the SEC to override guidance issued by the Financial Accounting Standards Board (FASB) and the Commission's staff that would effectively suspend fair value or mark-to-market accounting. We believe such urgings are decidedly not in the public interest.

A move by the SEC to suspend fair value accounting would be a disservice to the capital markets, would be inconsistent with the views of investors, would harm the credibility and independence of the standards setting process, and would run counter to fundamental notice and comment principles. With third quarter financial statements now in process and year-end 2008 imminent, such a change could jeopardize already-fragile investor confidence.

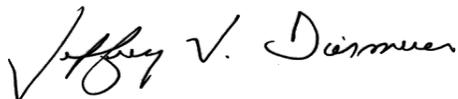
No one disputes that these are trying economic times. However, the current crisis of liquidity, credit, and confidence was not caused by fair value accounting; rather, sound accounting principles helped expose the problem. Fair value accounting with robust disclosures provides more accurate, timely, and comparable information to investors than amounts that would be reported under other alternative accounting approaches.

Investors have a right to know the current value of an investment, even if the investment is falling short of past or future expectations. It, therefore, is imperative at this critical juncture that we not engage in activities that would further obscure reality from investors and do more to damage confidence in the marketplace. We urge the SEC to be clear in rejecting urgings that are contrary to this imperative.

Sincerely,



Cindy Fornelli
Executive Director
Center for Audit Quality



Jeffrey J. Diermeier, CFA
President & Chief Executive Officer
CFA Institute



Barbara Roper
Director of Investor Protection
Consumer Federation of America



Jeff Mahoney
General Counsel
Council of Institutional Investors

cc:

Kathleen L. Casey, Commissioner, SEC
Elisse B. Walter, Commissioner, SEC
Luis A. Aguilar, Commissioner, SEC
Troy A. Paredes, Commissioner, SEC
Henry M. Paulson, Jr., Secretary, Department of Treasury
Ben S. Bernanke, Chairman, Federal Reserve
Mark W. Olson, Chairman, PCAOB
Robert H. Herz, Chairman, FASB
Sheila Bair, Chairman, FDIC
John C. Dugan, Comptroller of the Currency
John M. Reich, Director, Office of Thrift Supervision