

Private Company Financial Reporting Committee

401 Merritt 7, PO Box 5116, Norwalk, Connecticut 06856-5116
e-mail: jhodell@fasb.org

203-956-5218
Fax: 203-849-9714



JUDITH H. O'DELL
Chair

September 28, 2007

Mr. Robert Herz
Chairman
Financial Accounting Standards Board
401 Merritt 7
Norwalk, CT 06856

Re: Securities and Exchange Commission (“SEC”) Concept Release on Allowing U.S. Issuers to Prepare Financial Statements in Accordance with International Financial Reporting Standards (“IFRS”)

Dear Mr. Herz:

The Private Company Financial Reporting Committee (“PCFRC”) offers its initial views about the SEC Concept Release on Allowing U.S. Issuers to Prepare Financial Statements in Accordance with IFRS, as it may relate to private companies. The PCFRC recognizes the substantial ramifications this SEC Concept Release could have on private company financial reporting if the proposal were adopted and appreciates the opportunity to express its views.

The PCFRC supports the current efforts to converge U.S. and international accounting standards as that process is currently functioning, insofar as those efforts result in higher quality accounting standards. Moreover, the PCFRC believes a comprehensive parallel initiative for private company financial reporting, involving the key constituents of that reporting, is necessary if the SEC initiative moves forward. Such a parallel initiative would help ensure that any changes in the accounting standards setting structure in the U.S. would consider the needs of and make sense for constituents of U.S. private company financial reporting.

Please feel free to contact me if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Judith H. O'Dell', written in a cursive style.

Judith H. O'Dell
Chair
Private Company Financial Reporting Committee