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September 4, 2008

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

**RE: Support of PCFRC's positions on FASB Interpretation No. 48 & FASB Interpretation No. 46(R)**

Dear Mr. Herz,

For the record, we wish to support the position that Judy O'Dell's committee has taken to "exempt private companies from all the requirements of FIN 48" and we support the latest recommendations regarding Fin 46 (R) in her letter dated July 18, 2008 for stand-alone parent-only financial statements under GAAP.

Both of these Interpretations will cause an undue hardship on Maryland's privately-held businesses and the CPA firms that serve them due to the inherent complexity surrounding FIN 48 and FIN 46 R, the lack of in-house tax staff resident in privately held businesses and the fact that there is insufficient time for adequate communication, preparation, and education to effectively implement these complex provisions. Based on these reasons, we believe there would be no significant benefit to the private company users of these financial statements. We raise the question of whether the public interest of these standards is commensurate with the costs and burden of implementing them for private companies. We urge you to accept the recommendations by the Private Company Financial Reporting Committee and make these exemptions for U.S. privately-held companies.

Our recommendation has the full support of our Business & Industry Subcommittee on Professional Standards, a group dedicated to evaluating the impact of proposed standards on our private companies. Additionally, we have covered this in our town hall meetings where our members have expressed their support of permanent exemption or at a minimum another year postponement to give them time to prepare..

**The Maryland Association of CPAs** is the only statewide, professional membership organization dedicated to serving the needs of almost **10,000 Maryland Certified Public Accountants**. Founded in 1901, when the Certified Public Accountant statute was signed into law, the MACPA has been actively working to serve the needs of Maryland citizens and its CPA members ever since. We often say that "Public" is our middle name and our track record shows it. We work with standard setters, regulators and legislators to protect the public interest and enable our members to comply with the highest standards of the CPA Profession. Our membership contains approximately equal representation from both practicing CPAs (auditors) and CPAs in business, industry & government (preparers).

Thank you for your consideration,

Sincerely yours,

J. Thomas Hood, III, CPA.CITP  
CEO & Executive Director