



Consumer Federation of America



February 13, 2009

The Honorable Christopher J. Dodd
448 Russell Senate Office Building
United States Senate
Washington, DC 20510

The Honorable Barney Frank
2252 Rayburn House Office Building
United States House of Representatives
Washington, DC 20515

The Honorable Richard C. Shelby
304 Russell Senate Office Building
United States Senate
Washington, DC 20510

The Honorable Spencer Bachus
2246 Rayburn House Office Building
United States House of Representatives
Washington, DC 20515

Dear Senators and Representatives:

We are writing to applaud your efforts to restore investor confidence in the U.S. capital markets during this time of extreme uncertainty. As you seek solutions, we caution against taking action that could further undermine the confidence of investors.

We appreciate the challenges of dealing with the financial instability resulting from the toxic assets held by banks. However, changing financial accounting standards because of valuation challenges is not the way to solve regulatory capital problems. Retreating from fair value in response to political pressure would raise suspicions that the rules were changed in order to falsely inflate asset values. We must avoid a further crisis of investor confidence in our government and the regulatory bodies overseeing those institutions.

We should not confuse the independent private sector Financial Accounting Standards Board's role to develop and improve financial accounting and reporting standards with the role and responsibilities of the regulatory bodies charged with the oversight of the safety and soundness of financial institutions. We do not believe the FASB is the body to effect capital adequacy goals for the financial institution sector.

We applaud Treasury Secretary Geithner's efforts to find asset valuations that are fair, realistic, and provide the government with a good assessment of risk. However, this should not be done at the expense of fair value accounting information that best serves the interests of investors both now and over the long term.

We would be pleased to meet with you at your convenience to elaborate on our views.

Sincerely,



Cindy Fornelli
Executive Director
Center for Audit Quality



Patrick Finnegan
Director, Financial Reporting Policy Group
CFA Institute Centre for Financial Market Integrity



Barbara Roper
Director of Investor Protection
Consumer Federation of America



Jeff Mahoney
General Counsel
Council of Institutional Investors

cc:

Timothy F. Geithner, Secretary of the Treasury
Ben S. Bernanke, Federal Reserve Chairman
Mary L. Schapiro, SEC Chairman
Kathleen L. Casey, Commissioner, SEC
Elisse B. Walter, Commissioner, SEC
Luis A. Aguilar, Commissioner, SEC
Troy A. Paredes, Commissioner, SEC
Mark W. Olson, Chairman, PCAOB
Robert H. Herz, Chairman, FASB