



**fei**<sup>SM</sup>

financial executives  
international

**committee on corporate reporting**

September 26, 2007

Nancy M. Morris  
Secretary, Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

Re: File Number 265-24

Dear Ms. Morris,

The Committee on Corporate Reporting (“CCR”) of Financial Executives International (“FEI”) appreciates the opportunity to provide its views on the U.S. Securities and Exchange Commission’s (“SEC’s”) “Discussion Paper for Consideration by the SEC Advisory Committee on Improvements to Financial Reporting”(Release No. 33-8836, the “Discussion Paper”).

FEI is a leading international organization of 15,000 members, including Chief Financial Officers, Controllers, Treasurers, Tax Executives and other senior financial executives. CCR is a technical committee of FEI, which reviews and responds to research studies, statements, pronouncements, pending legislation, proposals and other documents issued by domestic and international agencies and organizations. This comment letter represents the views of CCR, and not necessarily those of FEI or its members individually.

CCR is very supportive of the formation of the SEC Advisory Committee on Improvements to Financial Reporting, chaired by Robert C. Pozen. Indeed, formation of such a broad-based committee to address complexity in financial reporting was among the key steps recommended in “FEI’s Recommendations to Address Complexity in Financial Reporting” (FEI’s “Four Point Plan”) published March 29, 2007.

As noted in our Four Point Plan, FEI believes that the success of such a committee “will depend on a shared commitment by all constituents to fundamentally change those facets of the financial reporting process that contribute to complexity.”

CCR supports the SEC Advisory Committee in its important work to make financial reporting more useful, and to reduce unnecessary complexity that

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interferes with the understandability and reliability of financial reporting, and diverts resources from more productive purposes without commensurate benefit.

Rather than preparing a comprehensive response to the discussion paper, we intend to take the opportunity to communicate specific concerns, ideas, and recommendations to the SEC Advisory Committee throughout the course of its work.

Members of CCR would be pleased to meet with the SEC's Commissioners, Staff, and members of the SEC Advisory Committee on Improvements to Financial Reporting, to discuss these issues in more depth and to answer any questions you may have. Please contact Cheryl Graziano at FEI [cgraziano@fei.org](mailto:cgraziano@fei.org) if you would like to arrange such a meeting or have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Arnold Hanish". The signature is fluid and cursive, with a large initial "A" and "H".

Arnold C. Hanish  
Chair, Committee on Corporate Reporting  
Financial Executives International

Cc: Robert C. Pozen, Chair, SEC Advisory Committee on Improvements to  
Financial Reporting