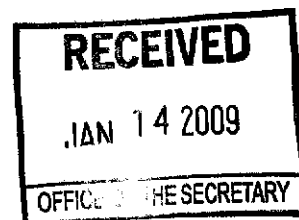




Marion C. Blakey  
President and Chief Executive Officer

January 13, 2009

Ms. Elizabeth M. Murphy  
Secretary  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-1090



Subject: File Number S7-27-08, IFRS Roadmap

Dear Ms. Murphy:

We appreciate the opportunity to provide comments on the Security and Exchange Commission's (SEC) proposed "roadmap" for the adoption of International Financial Reporting Standards (IFRS) by U.S. registrants. For the reasons stated below, we respectfully request a formal extension for the comment period from February 19, 2009 to April 30, 2009.

A transition from U.S. Generally Accepted Accounting Principles (GAAP) to IFRS is not an accounting standard adoption exercise but rather a global transformation project, impacting every facet of a company's operations. We want to provide the SEC with a very thoughtful and well articulated analysis of our assessment of the roadmap. A deadline of February 19<sup>th</sup> is not practicable as it falls at a time when most calendar year registrants are finalizing their 2008 Form 10Ks, meeting with audit committees, etc. Moreover, many registrants will continue to be busy in the first quarter dealing with the impacts of the economic crises. In order to maximize the comment letter response rate, we highly recommend that the SEC extend the comment letter deadline to April 30, 2009.

Thank you for your attention to our request. Because of the time necessary to respond to the proposal, we would appreciate it if a positive response could be made as soon as possible, so that we can react accordingly.

Sincerely,

*Marion Blakey*  
Marion C. Blakey

MCB:ss

cc: James L. Kroeker, SEC Acting Chief Accountant  
Wayne Carnell, SEC Chief Accountant, Division of Corporation Finance  
Michael D. Coco, SEC Special Counsel  
Julie Erhardt, SEC Deputy Chief Accountant, International