

# Graybar

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April 20, 2009

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

Re: File Number S7-27-08  
Comments with Respect to Roadmap for the Potential Use of Financial  
Statements Prepared in Accordance with International Financial Reporting  
Standards by U.S. Issuers ("Proposed Roadmap")

Dear Madam:

I am writing on behalf of Graybar Electric Company, Inc. ("Graybar") to express certain of our preliminary comments to, and concerns about, the above-referenced Securities and Exchange Commission ("Commission") Proposed Roadmap.

Graybar is engaged in the distribution of electrical, communications and data networking products and the provision of related supply chain management and logistics services. Graybar sells primarily to electrical and comm/data contractors, industrial plants, telephone companies, federal state and local governments, commercial users, and power utilities in North American. Graybar values its inventories at the lower of cost (determined using the last-in, first-out ("LIFO") cost method) or market.

Graybar applauds the anticipated objectives of moving from the current United States' Generally Accepted Accounting Principles ("U.S. GAAP") to the International Financial Reporting Standards ("IFRS") – namely enhancing the liquidity of capital markets and reducing the costs of capital while improving the quality of reporting along with the comparability of reporting practices around the world. Graybar, however, is concerned that the Proposed Roadmap is fraught with pitfalls, suggesting that the effort be abandoned or, at least, modified so as to lessen the foreseeable negative impacts that may be experienced by U.S. companies.

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The milestones set forth in the Proposed Roadmap depict an ambitious time line for the implementation of the IFRS. Possibly fully adopting the IFRS by 2016 is an aggressive schedule, given the complexities of the changing from U.S. GAAP to IFRS, particularly in the current economic environment. Indeed, Mary Schapiro raised concerns about this timetable during her Senate confirmation hearing.

Numerous U.S. companies such as Graybar have adopted LIFO. In fact, LIFO has been an inventory accounting option available to U.S. companies for approximately seven decades. Unwinding LIFO, whether in one-fell swoop or over a short period of time, will have significant negative tax consequences on large and small, public and private, companies.

Implementation of the IFRS will likely have innumerable and unforeseen consequences to companies' contractual obligations and rights. A variety of agreements entered into by U.S. based companies contain covenants related to U.S. GAAP. Some contracts come readily to mind, such as credit facilities, employment agreements, and indentures. Moving from U.S. GAAP to the IFRS will require an intensive, thorough, and costly review, as well as likely modification of corporate documents.

The foregoing is merely a brief summary of only some of the concerns arising out of the Proposed Roadmap. The Commission has received a great many other letters from individuals, businesses, and trade associations expressing their reservations with the Proposed Roadmap. In light of the current economic challenges facing our Country along with the immense nature of the contemplated change, considerably more time should be afforded all interested and potentially affected parties to fully study, understand, and if necessary, prepare for the consequences of a shift from U.S. GAAP to the IFRS.

Sincerely,



Matthew W. Geekie