Dear Sir:

Thank you for the opportunity to comment on the proposed Concepts Statement related to Measurement of Elements of Financial Statements.

As financial reporting becomes more complex, and the public more involved, we should be attempting to make terminology more easily understood. We agree with the concepts and definitions of historical cost, fair value, replacement cost, and settlement amount. We believe the term “attribute” is not descriptive, and recommend the term “method” would be more appropriate.

We agree with the non-inclusion of lower-of-cost-or-market. While the intent of this attribute was conservativeness, it led to confusion and is better replaced with the other attributes.

In addition, we disagree with the Alternative View that the financial statements should be used for more management decision information, such as the timing of asset purchases and sales. The timing and delivery of year-end financial statements does not allow management the opportunity to use the statements to make all decisions.

Thank you for the opportunity to participate in the standard-setting process.

Sincerely,

Brenda Morris
Financial Services Director