

**STANDARD
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Credit Market Services

55 Water Street
New York, NY 10041

July 3, 2008

Florence E. Harmon
Acting Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Via Electronic Mail: rule-comments@sec.gov.

Re: File No. 4-560

Submission for Roundtable on Fair Value Accounting Standards

Dear Ms. Harmon:

Standard & Poor's Ratings Services (Standard & Poor's) appreciates the opportunity to provide the Securities and Exchange Commission (the Commission) with our submission for consideration at the Commission's July 9, 2008, *Roundtable on Fair Value Accounting Standards* (the Roundtable). Fair value accounting and reporting issues are critically important to Standard & Poor's analysts, especially considering the current turbulent market environment, the evolutionary state of global financial reporting standards, and the Commission's initiative to improve financial reporting undertaken by its Advisory Committee on Improvements to Financial Reporting.

Our accompanying whitepaper, "Is It Time To Write Off Fair Value?" (also available on RatingsDirect, the web-based source for Standard & Poor's credit ratings, research, and risk-analysis), outlines our views of fair value accounting and financial reporting. It elaborates upon topics the Commission indicated are relevant to the Roundtable discussion, including the usefulness of fair value accounting; practical experience and potential challenges in applying the fair value accounting standards; and aspects of the current fair value standards that can be improved. The views expressed in this letter and in the whitepaper represent those of Standard & Poor's, and do not address, nor are they intended to address, the views of The McGraw-Hill Companies.

We support the basic premise that fair value, when coupled with robust disclosure, is a relevant basis of accounting for financial assets and liabilities. However, we recognize that accounting for assets and liabilities at theoretical market-price measures may produce results that could mask the underlying economics for certain businesses and activities, especially during volatile and uncertain economic and market conditions. Our support of fair value accounting is constrained by what we view as significant shortcomings in related disclosures, the prevalence of "mixed attributes" in measurement, and shortcomings to the presentation in the income statement of fair value accounting results.

