



April 28, 2008

Mr. Russell G. Golden  
Director of Technical Application and Implementation Activities  
FASB  
401 Merritt 7  
PO Box 5116  
Norwalk, CT 06856-5116

RE: File Reference: Proposed FSP FAS 117-a

Mr. Golden:

The Accounting Principles Council (APC) of the National Association of College and University Business Offices (NACUBO) thanks the Board for accepting comments from constituents on the proposed FSP referenced above. The guidance it will provide is very important to the higher education industry.

The APC would like to affirm its support of the views expressed in the comment letter submitted by NACUBO, Presidential Associations, and the Association of Governing Boards. In particular, the Board should not underestimate the problems institutions may face by the proposed requirement for governing boards to interpret relevant law in order to determine what needs to be retained permanently to maintain the purchasing power of a donor-restricted endowment fund. We do not believe the Uniform Prudent Management of Institutional Funds Act (UPMIFA) calls for such an interpretation. In addition, certain aspects regarding the unique nature of donor-restricted endowments that are to be retained and used by an organization in perpetuity do not fit well within FASB's current net asset categories.

The APC consists of experienced accounting and finance professionals from NACUBO member institutions who possess a thorough knowledge of higher education endowment accounting and reporting issues and practices.

We ask that our support for the NACUBO comment letter be posted.

Dale Larson – Chair  
University of Dallas

Sandra Brown – Vice Chair  
The Texas A&M University System

Jeffrey West  
University of Utah

Steve Kimata  
University of Virginia

Debra Martin  
Loyola Law School

Gillian Emmons  
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Mr. Joe Schwartz  
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