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financial executives  
international

January 23, 2009

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

Subject: File Number S7-27-08

Dear Ms. Murphy:

Financial Executives International (“FEI”) is a leading international organization of senior financial executives. FEI has become the leading advocate for the views of corporate financial management. Its 15,000 members hold policy-making positions as chief financial officers, treasurers, and controllers. FEI, through its technical committees, reviews and responds to research studies, statements, pronouncements, pending legislation, proposals and other documents issued by domestic and international agencies and organizations.

FEI appreciates the opportunity to provide our view on the Securities and Exchange Commission’s (the “SEC”) proposed rule “Roadmap for the Potential Use of Financial Statements Prepared in Accordance with International Financial Reporting Standards by U.S. Issuers” (the “Roadmap”). At this time, as our members and technical committees are preparing their comments in response to the Roadmap, we respectfully request that the SEC consider a formal extension of the comment period by an additional 45 days.

The Roadmap is a critical document which requires significant focus and attention to ensure the proper and complete analysis of all of the issues. The potential transition to International Financial Reporting Standards is much more extensive than simply an adoption of new accounting and reporting standards, but represents a transformation impacting a company’s entire organization and must be considered carefully.

Our membership as well as our technical committees are mindful of the importance of this proposal and want to provide as thorough and constructive an analysis as possible to assist the SEC in their decision making in this area. Many, if not most of our FEI member companies are calendar year registrants, and are thus in the midst of finalizing their 2008 10-K filings. With a reporting season that is uniquely challenged by the economic crisis, companies are finding it difficult to dedicate the necessary time and analysis to the questions asked in the Roadmap, while focused on continuing to provide accurate and transparent information to

their shareholders in this difficult time. FEI believes that an extended comment period will significantly increase the number and level of detail of the responses provided for such a significant proposal.

Thank you for your consideration of our request. I can be contacted at 973.765.1071 or [cdifabio@financialexecutives.org](mailto:cdifabio@financialexecutives.org) with any questions or follow-up.

Sincerely,

A handwritten signature in cursive script that reads "Christine DiFabio".

Christine DiFabio  
Vice President, Technical Activities  
Financial Executives International

cc: James Kroeker, SEC Acting Chief Accountant  
Wayne Carnall, SEC Chief Accountant, Division of Corporation Finance  
Julie Erhardt, Deputy Chief Accountant, Office of the Chief Accountant