

VIA E-MAIL:

From: "Alfred M. King" <alfredking@erols.com>
Date: August 19, 2007 8:04:41 AM PDT
To: <CommentLetter@ivsc.org>
Subject: Responses to Questions on Intangible Assets

2.1.1 Yes there is a need for guidance. FASB's SFAS 157 is more oriented to financial instruments

2.1.2 Level is approximately detailed enough as presented. Any more detail and you will be telling valuation specialists how to do their job

2.1.3 Yes, it meets the intentions of 1.4

2.1.4 Yes, a Technical Paper would be most appropriate for further guidance.

Overall evaluation: Very well done. I hope FASB takes this to heart.

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