April 20, 2009

International Accounting Standards Board  
30 Cannon Street  
London EC4M 6XH  
United Kingdom

Dear Sir

Re: IAA comments on the IASB's request for views on the FASB recent FSPs

In response to the request for views on the FASB's recently promulgated FSPs, I am pleased to transmit on behalf of the International Actuarial Association (IAA) our comments and recommendations.

These comments have been prepared by the Committee on Insurance Accounting of the IAA. If, upon reading these comments, you identify any points that you wish to pursue, please do not hesitate to contact the chairperson of that Committee, Sam Gutterman, or any of the other members of the Committee. The IAA will be glad to develop these ideas further with you.

Yours sincerely,

Yves Guérard  
Secretary General

Attachment: IAA comments
A Commentary on the
REQUEST FOR VIEWS ON
PROPOSED FASB AMENDMENTS ON FAIR VALUE MEASUREMENT
PROPOSED FASB AMENDMENTS TO IMPAIRMENT REQUIREMENTS FOR CERTAIN
INVESTMENTS IN DEBT AND EQUITY SECURITIES
Released by the International Accounting Standards Board: March 2009

International Actuarial Association
The International Actuarial Association (the “IAA”) represents the international actuarial profession. Our sixty-two Full Member actuarial associations represent more than 95% of all actuaries practicing around the world and are listed in an Appendix to these comments. The IAA promotes high standards of actuarial professionalism across the globe and serves as the voice of the actuarial profession when dealing with other international bodies on matters falling within or likely to have an impact on the areas of expertise of actuaries.

IAA Commentary
The IAA appreciates the opportunity to address comments to the IASB regarding the FASB’s recent FSPs. These comments have been prepared by our Insurance Accounting Committee, the members of which are listed in the Appendix. This letter has been subject to the due process required for it to constitute a formal view of the IAA, and will be posted to the IAA’s web site. Our comments are of a general nature, as discussion of details of these FSPs are more appropriate during due process regarding views or firm proposals of the Board.

As we have indicated before and consistent with recent G20 recommendations, we strongly encourage worldwide convergence towards a single set of high quality accounting standards. This, of course, includes convergence with the U.S. GAAP of the FASB. We believe that it will pay significant dividends to work with other accounting standard setters on developing and providing consistent, principles-based high quality standards regarding both fair value measurement and the recognition and measurement of financial instruments and insurance contracts.

We appreciate the IASB’s efforts to incorporate some of the relevant points addressed in the FSPs on fair value measurement in its upcoming exposure draft, particularly those consistent with the findings of the IASB’s Expert Advisory Panel. In addition, we assume that the IASB will incorporate some of the relevant portion of the IASB’s Expert Advisory Panel’s paper produced in 2008 on measurement and disclosure of fair values of financial instruments in the exposure draft.

We agree with and encourage the IASB’s current direction, together with other appropriate accounting standard setters, to undertake a comprehensive review and revision of IAS 39 on a high priority basis, rather than the piecemeal approach that has been undertaken in the past. In the course of such a project, we believe the multiple and in some cases inconsistent impairment models used by the IASB and the FASB need to be addressed. We believe that a consistent,
principles-based approach to the recognition and measurement of impairments and liability adequacy is urgently needed.

In addressing all of these issues, we continue to encourage the use of a due process period of a minimum length of time to enable stakeholders to appropriately comment on these very important topics.
Appendix A

Members of the IAA Insurance Accounting Committee

Sam Gutterman   Chairperson
David Congram   Co-Vice-Chairperson
Francis Ruygt   Co-Vice-Chairperson
Gunn Albertsen  Den Norske Aktuarforeningen
Yutaka Amino    Institute of Actuaries of Japan
Victor Bagnati   Instituto Brasileiro de Atuária (IBA)
Daniel Barron   Israel Association of Actuaries
Ralph Blanchard Casualty Actuarial Society
Guy Castagnoli   Association Suisse des Actuaires
Antonella Chiricosta  Istituto Italiano degli Attuari
Alexander Dollhopf Svenska Aktuarieföreningen
Guillermo Lopez De La Garma Instituto de Actuarios Españoles
David Finnis  Institute of Actuaries of Australia
Mark Freedman  Society of Actuaries
Kavassery S. Gopalakrishnan  Institute of Actuaries of India
Rokas Gyllys  Lietuvos aktuariju draugija
William C. Hines American Academy of Actuaries
Armand Ibo  Institut des Actuaires de Côte d'Ivoire
Dragica Jankovic  Udru enje Aktuara Srbije
Burton D Jay  Conference of Consulting Actuaries
Jelica Klucovska  Slovenska Spolocnost Aktuárov
Ad Kok  Het Actuarieel Genootschap
Christoph Krischanitz  Aktuarvereinigung Österreichs (AVÖ)
Kurt Lambrechts  Association Royale des Actuaires Belges
Yin Lawn  Actuarial Institute of Chinese Taipei
Kristine Lomanovska  Latvijas Aktuāru Asociācija
Brian Morrissey  Society of Actuaries in Ireland
Andreja Radic  Hrvatsko Aktuarsko Drustvo
Nithiarani Rajasingham  Singapore Actuarial Society
Thomas Ringsted  Den Danske Aktuarforening
Matthew Saker  Faculty of Actuaries
Jaanus Sibul  Eesti Aktuaaride Liit
Dieter Silbernagel  Deutsche Aktuarvereinigung e.V.
Pentti Soininen  Suomen Aktuaariyhdistys
Bjarni Thórdarson  Félag Íslenskra Tryggingastærðfræðinga
Charles Vincensini  Institut des Actuaires
Peter Withey  Actuarial Society of South Africa
Derek Wright  Institute of Actuaries
Jana Zelinkova  Ceská Spolecnost Aktuárů
Jesús Zúñiga  Colegio Nacional de Actuarios A.C.
Appendix

Full Member Associations of the IAA
Consejo Profesional de Ciencias Económicas de la Ciudad Autónoma de Buenos Aires (Argentina)
Institute of Actuaries of Australia (Australia)
Aktuarvereinigung Österreichs (AVÖ) (Austria)
Association Royale des Actuaires Belges (Belgique)
Instituto Brasileiro de Atuária (IBA) (Brazil)
Bulgarian Actuarial Society (Bulgaria)
Canadian Institute of Actuaries/Institut Canadien des Actuaires (Canada)
Caribbean Actuarial Association
Actuarial Institute of Chinese Taipei (Chinese Taipei)
Institut des Actuaires de Côte d’Ivoire (Côte D’Ivoire)
Hrvatsko Aktuarsko Drustvo (Croatia)
Cyprus Association of Actuaries (Cyprus)
Česká Společnost Aktuářů (Czech Republic)
Den Danske Aktuarforening (Denmark)
Egyptian Society of Actuaries (Egypt)
Eesti Aktuaaride Liit (Estonia)
Suomen Aktuaariryhmistö (Finland)
Institut des Actuaires (France)
Deutsche Aktuarverband e.V. (DAV) (Germany)
Hellenic Actuarial Society (Greece)
Actuarial Society of Hong Kong (Hong Kong)
Magyar Aktuárius Társaság (Hungary)
Félag Islenskra Tryggingastærðfræðinga (Iceland)
Institute of Actuaries of India (India)
Persatuan Aktuaris Indonesia (Indonesia)
Society of Actuaries in Ireland (Ireland)
Israel Association of Actuaries (Israel)
Istituto Italiano degli Attuari (Italy)
Institute of Actuaries of Japan (Japan)
Japanese Society of Certified Pension Actuaries (Japan)
Latvijas Aktuaru Asociācija (Latvia)
Lebanese Association of Actuaries (Lebanon)
Lietuvos Aktuarų Draugija (Lithuania)
Persatuan Aktuari Malaysia (Malaysia)
Colegio Nacional de Actuarios A.C. (Mexico)
Association Marocaine des Actuaires (Morocco)
Het Actuarieel Genootschap (Netherlands)
New Zealand Society of Actuaries (New Zealand)
Den Norske Aktuarforening (Norway)
Pakistan Society of Actuaries (Pakistan)
Actuarial Society of the Philippines (Philippines)
Polskie Stowarzyszenie Aktuarium (Poland)
Instituto dos Actuários Portugueses (Portugal)
Academia de Actuarios de Puerto Rico (Puerto Rico)
Russian Guild of Actuaries (Russia)
Udruženje Aktuara Srbije (Serbia)
Singapore Actuarial Society (Singapore)
Slovenska Spolocnost Aktuarov (Slovakia)
Slovensko Aktuarsko Drustvo (Slovenia)
Actuarial Society of South Africa (South Africa)
Col.legi d'Actuaris de Catalunya (Spain)
Instituto de Actuarios Españoles (Spain)
Svenska Aktuarieföreningen (Sweden)
Association Suisse des Actuaires (Switzerland)
Society of Actuaries of Thailand (Thailand)
Faculty of Actuaries (United Kingdom)
Institute of Actuaries (United Kingdom)
American Academy of Actuaries (United States)
American Society of Pension Professionals & Actuaries (United States)
Casualty Actuarial Society (United States)
Conference of Consulting Actuaries (United States)
Society of Actuaries (United States)