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Direct dial : Tel.: (+31) 20 301 0391 / Fax: (+31) 20 301 0302
Date : Amsterdam, 15 September 2009
Re : **Comment on Exposure Draft Fair Value Measurement**

Dear members of the EFRAG Technical Expert Group,

The Dutch Accounting Standards Board (DASB) appreciates the opportunity to respond to your draft comment letter on the Exposure Draft Fair Value Measurement.

In general, we think that the Exposure Draft is too much focused on Financial Instruments and we fear that the approach is not appropriate for all non-financial liabilities.

In our analysis of this Exposure Draft we seem to have a different opinion in respect of the response to certain specific questions raised by the IASB. We have the following points in which we qualify the views of EFRAG:

- Question 3. We do not agree with the proposal of the IASB. Although we expect that in many cases the outcome would not differ from a 'principal market'-approach – especially where fair values of level 1 and 2 apply - , we fear that application of the proposed approach will often be overly cumbersome and would not provide a true and fair view, despite the relaxation of the required search of all possible markets. If the proposed approach would be adopted, additional guidance would be needed for commodities where location and differences in quality affect the fair value.
- Question 8. We are aware of the lengthy and difficult discussion on the topic of own credit risk. We do see the practical objections against the recognition of gains and losses as a result in the changes of own credit risk. We also see, however, the complexity in the accounting when these effects are to be eliminated. We therefore tend to agree with the proposal made by the IASB. We refer to our letter in relation to the Discussion Paper Credit Risk in Liability Measurement.

- Question 9. Although we agree on the matter discussed, we believe that a standard on the definition of fair value should not address the recognition of gains and losses. This should be addressed in the standards that require or allow fair value measurement.

As observed before, we underline the need for IASB and FASB to achieve convergence between the two sets of standards. Emergence of new differences suggests a lack of synchronization in this process. We urge the IASB (and the FASB) to put more effort in achieving convergence.

We agree with all other comments in your draft comment letter.

Yours sincerely,

A handwritten signature in black ink, consisting of a vertical line on the left, a loop at the bottom left, and a long horizontal stroke that curves upwards at the right end.

Hans de Munnik
Chairman Dutch Accounting Standards Board