

MONTANA DEPARTMENT OF LABOR AND INDUSTRY
BUSINESS STANDARD DIVISION
BOARD OF PUBLIC ACCOUNTANTS
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August 14, 2006

Chairman Robert H. Herz
Financial Accounting Standards Board
401 Merritt 7
Norwalk, Connecticut 06856-5116

RE: File reference 1310-100, Invitation to Comment, *"Enhancing the Financial Accounting and Reporting Standard-Setting Process for Private Companies"*

Dear Chairman Hertz and Board members:

The Montana Board of Public Accountants ("the Montana Board") thanks the Financial Accounting Standards Board ("FASB") for this opportunity to comment on the proposed process for establishing financial and reporting standards for non-publicly traded private sector for-profit companies ("the Proposal").

The Montana Board generally agrees with the comments made by the Colorado State Board of Accountancy, especially as to the concern that FASB's independence might be questioned if FASB directly partners with the American Institute of Certified Public Accountants ("AICPA") in funding and sponsoring the Proposal. The Montana Board certainly recognizes that the AICPA and its members have an important role in the development of standards, as do other interested parties. However, the Montana Board respectfully suggests that all interested parties should have a seat at the FASB table, and representational organizations, such as AICPA and the National Association of State Boards of Accountancy ("NASBA"), should not be granted any special status or privileges during the discussions.

The Montana Board looks forward to an opportunity to comment on the substantive work to flow out of the Proposal.

Sincerely,



Kathleen M. VanDyke, Presiding Officer
Montana Board of Public Accountants

c: NASBA
AICPA