



**The Japanese Institute of
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International Accounting Standards Board
30 Cannon Street
London EC4M 6XH
United Kingdom

***Comments on the Exposure Draft of Measurement Uncertainty Analysis Disclosure
for Fair Value Measurements***

To the Board Members:

The Japanese Institute of Certified Public Accountants appreciates the continued efforts of the International Accounting Standard Board (IASB) on the financial crisis and welcomes the opportunity to comment on the exposure draft of *Measurement Uncertainty Analysis Disclosure for Fair Value Measurements*.

The following is our response to the items in 'invitation to comment' with which we disagree or have questions or concerns.

Correlation between unobservable inputs

Question 1

Are there circumstances in which taking into account the effect of the correlation between unobservable inputs (a) would not be operational (eg for cost-benefit reasons) or (b) would not be appropriate? If so, please describe those circumstances.

Comment:

We do not believe that the proposed disclosure should be required on uniform basis.

We are not opposed to the proposed requirement, to take into account the effect of the correlation between unobservable inputs, which would contribute to the provision of useful information. However, from the viewpoint of the technical feasibility in the reasonable estimation process, we believe that, for most entities, disclosure requirements on the results of taking into account the effect of the correlation between unobservable inputs would not be operational.

Yours faithfully,

Keiko Kishigami

Executive Board Member - Accounting Standards

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