



Mr. Robert H. Herz, Chairman Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, Connecticut 06856-5116 U.S.A.

Sir David Tweedie, Chairman International Accounting Standards Board 30 Cannon Street London EC4M 6XH United Kingdom

March 1, 2007

Subject: Reporting Discontinued Operations

Dear Mr. Herz and Sir Tweedie,

On February 23, 2007, NAREIT sent the attached letter to the FASB and IASB in connection with the conclusion of the Boards with respect to reporting Discontinued Operations.

Whereas NAREIT is the representative voice for U.S. Reits and publicly traded real estate companies world wide, EPRA the European Public Real Estate Association, represents European public real estate companies and investment institutions as well as those firms and individuals who advise, study and service those businesses.

We understand that the FASB and IASB have tentatively agreed to a harmonized definition of discontinued operations where the disposal of a component(s) of an entity would be reported in the discontinued operations section of the financial statements only if that component(s) represents an operating segment, as defined in FASB Statement No. 131, Disclosures about Segments of an Enterprise and Related Information.

In general, EPRA fully supports the conclusions of the Boards and we believe that they will resolve issues faced by our member companies that report under or reconcile to US-GAAP.

However, we also support NAREIT's request to encourage early implementation of the Boards' conclusions expeditiously and are in agreement with NAREIT's motives. Early implementation of the conclusions would not only mean an important step toward the global harmonization of accounting standards, but in practice also ease the requirement under which real estate companies reporting under US-GAAP have to restate their previously filed financial statements and interim reporting very frequently, as it is their business to regularly dispose of real estate assets.

We therefore request the Boards to complete the due processes relating to amending the reporting of Discontinued Operations separate from the long-term Financial Statement Presentation Project, in order for the harmonized definition to be applied as early as possible.

If you wish to discuss this matter further, please do not hesitate to contact us.

Yours faithfully.

Hans Bruggink

Director Reporting Practices

cc. by e-mail:
Paul Beswick, FASB
Elizabeth Hickey, IASB
George Yungman NAREIT

Attachment: NAREIT letter February 23, 2007