

9 October 2007

Andrew Olding
Walker Working Group
3 Clements Inn
London
WC2A 2AZ

Dear Mr. Olding,

We are pleased to provide the following comments on behalf of CFA Institute¹ and the Global Investment Performance Standards® (GIPS®). The GIPS standards are a set of ethical principles used by investment management firms in order to establish a globally standardized, industry-wide approach to creating performance presentations that communicate investment results to prospective clients. The underlying spirit of the Standards is fair representation and full disclosure. CFA Institute created and administers the GIPS standards and partners with twenty eight local country sponsors (including the United Kingdom Investment Performance Committee) around the world to promote the Standards. Since their introduction over twenty years ago, the principles upon which the Standards are based have grown to represent global best practice in the area of investment performance.

The GIPS standards are geared toward presenting a firm's investment performance to prospective investors as opposed to existing clients. The goal of the GIPS standards is to provide investors with performance information that is calculated and presented appropriately and to allow them to evaluate asset managers with information that is comparable.

The GIPS standards include specific provisions addressing the calculation and presentation of performance information of private equity managers, as well as valuation guidelines. These provisions and guidelines were developed with the input of investment professionals from the private equity industry globally. We perform a comprehensive review of the Standards every five years and are now preparing for the next review of the Standards. As part of that review, we would welcome your participation and input as to how the GIPS standards can better meet the needs of the private equity industry and, more specifically, private equity investors.

Given the wide acceptance of the GIPS standards globally, we encourage the working group to utilize and promote the GIPS standards within the private equity industry.

We are pleased to have the opportunity to submit these comments on the Consultation Document. In addition, we support the comments submitted by the United Kingdom Investment Performance Committee. We applaud the efforts of the working group and we look forward to any opportunity for collaboration in the future, particularly as we begin the process of reviewing the private equity related provisions to the GIPS

¹ With headquarters in Charlottesville, Virginia, USA, and regional offices in London, Hong Kong, and New York, CFA Institute, is a global, not-for-profit professional association of more than 93,000 financial analysts, portfolio managers, and other investment professionals in 134 countries and territories, of whom more than 79,000 are holders of the Chartered Financial Analyst® (CFA®) designation. CFA Institute membership also includes 134 member societies and Chapters in 55 countries and territories.

standards. If you have any questions, please feel free to contact me at +1-434-951-5311 or jonathan.boersma@cfainstitute.org. In addition, we have recently brought on Charles Cronin to head up the CFA Institute Centre for Financial Market Integrity for the Europe, Middle East, and Africa out of our London office. Charles can be contacted at 020-7531-0762 or charles.cronin@cfainstitute.org.

Sincerely,

/s/

Jonathan A. Boersma, CFA
Executive Director
Global Investment Performance Standards
CFA Institute

/s/

J. Charles Cronin, CFA
Head, EMEA
CFA Institute Centre for Financial Market Integrity