



October 28, 2004

Letter of Comment No: 229
File Reference: EITF03-1A

Mr. Lawrence Smith
Director and Chairman of the Emerging Issues Task Force
Financial Account Standards Board
401 Merritt 7
Norwalk, Connecticut 06856

Re: Proposed FASB Staff Position, EITF Issue 03-1-a, Implementation Guidance for the Application of Paragraph 16 of EITF Issue No. 03-1, "The Meaning of Other-Than-Temporary Impairment and Its Application to Certain Investments"

Dear Mr. Smith:

We at Platinum Bank appreciate the opportunity to provide comment on the proposed Staff Position issued September 15, 2004 by the Financial Accounting Standards Board (FSP 03-1-a) and delay of the effective date of this rule to allow for our input.

Platinum Bank is a \$230 million community bank located in Brandon, Florida (the Tampa Bay area). We opened in 1997 to fulfill the need to provide personal and affordable banking services to small and medium sized businesses that we felt were not being provided by the large banking institutions in our community.

During our seven successful years of operation we have managed our Bank through a most volatile interest rate environment. We must retain the ability to actively manage our Balance Sheet in anticipation of, or in reaction to, changes in: liquidity needs, interest rates, funding sources, asset liability management, interest rates and availability and yield on other investments. Our securities portfolio consists almost entirely of U.S. Treasury, U.S. Government Agency and Agency mortgage backed securities and we must retain the ability to practice prudent investment portfolio management which includes the ability to sell securities. Strict interpretation of the proposed rule would hinder this ability.

The types of securities that we hold in our portfolio carry very little credit risk and their values are influenced by the level of interest rates. While these securities may have a value below cost at any given time, it does not automatically mean they are impaired. We believe that there should be a better definition of "other-than-temporary" impairment with respect to losses as a result of events, rather than be limited to changes in interest rates. Consideration should be given to credit ratings, interest payment history and the ability to repay in analyzing impairment.

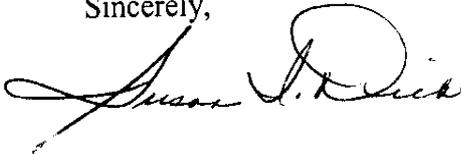
Susan I. Dick, Senior Vice President/CFO

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The AFS classification is one of our most controllable avenues to manage our overall balance sheet position. We need the appropriate level of flexibility to manage our interest rate risk and the ability to sell AFS securities from the portfolio provides a method for our response to these changes as we do not, as the larger banks do, have the systems, processes or sophistication to incorporate derivatives into our risk management strategies at this time. Safe and sound banking practices are of the utmost importance to Platinum Bank and our concern is that the proposal may severely restrict our ability to continue effective and safe asset/liability management.

Thank you for allowing us the opportunity to comment on this proposal and for considering our views.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susan I. Dick". The signature is written in black ink and is positioned below the word "Sincerely,".