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CREDIT UNION

March 20, 2009

LETTER OF COMMENT NO. 12

LETTER OF COMMENT NO. 8

Financial Accounting Standards Board
Attn: Mr. Russell G. Golden, FASB Technical Director
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

RE: FAS 157, and the OTTI FSP

Dear Mr. Golden:

I wish to complement the Board on considering changes in its practices regarding the fair value application of assets in an inactive market and OTTI assets. This will be an improvement over the current practice. We are in a very rare economic scenario and how financial institutions are allowed to treat assets that they intend to hold onto until there is market improvement or until they mature is of utmost importance to not only the economic viability of some institutions but also the confidence level that the public has in financial institutions in general.

I would ask that in your considerations of these topics that the Board also considers making this rule change effective December 31, 2008. My reasoning for this is that since the SEC requested this change back in December, it would be appropriate to make the ruling effective at year end. Also, there appeared to be a large response in support of this ruling however the Board either could not or possibly did not act quickly enough to get the rule change in December. This would support the idea of making the rule effective in December.

Additionally, realizing the loss on the income statement when there is no intent to sell an asset because the market has temporarily contracted and there is ability to hold the asset with further impairment to the liquidity of the institution would seem to be excessive treatment. Especially, if there is evidence that the asset will recover either all or at least most of its value in the foreseeable future.

As far as the actual rule is concerned, it is appropriate to consider the rule change and apply it to the intent and the ability of the institution to hold any impaired asset until the market reactivates to identify what the true value is or if the impaired assets are to be held to maturity.

Thank you for considering my comments prior to your rule change vote.

Sincerely,

Alan Olsen

Alan Olsen
Finance Manager (Chief Financial Officer)

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