From: Cindy Leaver [mailto:Cleaver@numericacu.com]

Sent: Friday, March 20, 2009 4:38 PM

To: Director - FASB

Cc: Dennis Cutter; Nancy Norbury-Harter; Gene Fitzpatrick

Subject: Proposed FSP FAS 157-e



LETTER OF COMMENT NO. 15

Question 1: Is the proposed effective date of interim and annual periods ending after March 15, 2009, operational?

Answer 1: I disagree that it should be effective March 15, 2009. Instead, I believe it should be effective December 31, 2008. Congress identified this as a concern to the SEC on December 30, 2008. Even though the process was not handed off to FASB until after that time, the problem existed in 2008 (and probably before). Many of the problems in our current economic environment are associated with these accounting requirements. By waiting until 2009, FASB will miss an opportunity to correct issues that were not anticipated and further delay economic recoveries that are at least partly hinged on some necessary changes to accounting rules.

Question 2: Will this proposed FSP meet the project's objective to improve financial reporting by addressing fair value measurement application issues identified by constituents related to determining whether a market is not active and a transaction is not distressed? Do you believe the amendments to Statement 157 in this proposed FSP are necessary, or do you believe the current requirements in Statement 157 should be retained?

Answer 2: I do believe this FSP will improve financial reporting in regards to 'inactive' markets and 'distressed' transactions. The FSP establishes additional guidance and clarification that allows a more reasonable approach to fair value measurement. I believe that the amendment to Statement 157 is necessary.

Question 3: Do you believe the proposed two-step model for determining whether a market is not active and a transaction is not distressed is understandable and operational? If not, please suggest alternative ways of identifying inactive markets and distressed transactions.

Answer 3: I do believe the two-step model is understandable and operational.

Question 4: Are the factors listed in paragraph 11 of the FSP that indicate that a market is not active appropriate: Please provide any other factors that indicate that a market is not active?

Answer 4: In my opinion the factors listed are appropriate.

Question 5: What costs do you expect to incur if the Board were to issue this proposed FSP in its current form as a final FSP? How could the Board further reduce the costs of applying the requirements of the FSP without reducing the benefits?

Question 5: If the FSP is NOT amended to have an effective date of December 31, 2008, our institution will undergo approximately \$5 million in expense to re-capitalize our portion of the NCUSIF fund due to capital issues on the Corporate credit unions books in part caused by fair value and OTTI issues. The Board could potentially reduce our costs and the cost of all natural-person credit unions that are federally insured by changing the effective date of this FSP and the OTTI FSP to December 31, 2008. My understanding is that certain investment impairments on the Corporate credit unions book might be reduced by these amended FSPs. If the impairments were reduced then those Corporates might not need the extent of backing that is currently being provided by the NCUA including a capital infusion of \$1 billion into U.S. Central. These actions have resulted in an impairment to our NCUSIF fund and the potential assessment of a premium to stabilize the corporates. I strongly encourage that the effective date of both FSPs be amended to December 31, 2008.