

From: Dan Blanton [DBlanton@georgiabankandtrust.com]
Sent: Wednesday, December 31, 2008 10:46 AM
To: Director - FASB
Subject: Comments: Proposed FSP EITF 99-20-a
Attachments: image001.png

Via email to: director@fasb.org

Attn: Technical Director
 Financial Accounting Standards Board
 301 Merritt 7
 P.O. Box 5116
 Norwalk, CT 06856-5116



LETTER OF COMMENT NO. 264

**File Reference: Proposed FSP EITF 99-20-a (Amendments to the
 Impairment and Interest
 Income Measurement Guidance of EITF Issue No. 99-20)**

Dear Technical Director:

Georgia Bank & Trust is wholly owned by our holding company, Southeastern Bank Financial Corporation, a thinly-traded, publicly-held, accelerated filer. Our Bank appreciates the recent focus of the Financial Accounting Standards Board (FASB) on the important issue of "other than temporary impairment" (OTTI).

We strongly support the FASB's Proposed FASB FSP EITF 99-20-a, *Amendments to the Impairment and Interest Income Measurement Guidance of EITF Issue No. 99-20*, which would amend EITF Issue No. 99-20 (*Recognition of Interest Income and Impairment on Purchased Beneficial Interests and Beneficial Interests That Continue to Be Held by a Transferor in Securitized Financial Assets*). We urge you to issue the proposal in final form, to be effective for December 31, 2008 financial reporting.

We also support the proposal as a first step toward improving the application of OTTI, and we appreciate the FASB's recent decision to examine additional problems relating to OTTI. We agree with the letter from the American Bankers Association to the FASB on the proposal, dated December 28, 2008, which supports the proposal and requests that additional OTTI concerns be addressed for year-end 2008 reporting. OTTI has been controversial for many years, and we believe it would be more meaningful to use a model based on credit impairment rather than on market values. Because of the significance of the problems with the application of OTTI in the current market environment, we believe changes to these practices are critical for year-end 2008 financial reporting.

Thank you for your attention to these matters and for considering our views.

Sincerely,

R. Daniel Blanton
 President & CEO
 Georgia Bank & Trust
 3530 Wheeler Road
 Augusta, GA 30909