**DIME COMMUNITY BANCSHARES, INC.**
**209 Havemeyer Street**
**Brooklyn, New York 11211**

December 29, 2008

Technical Director, Financial Accounting S
301 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Via email: director@fasb.org

LETTER OF COMMENT NO. 65

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:

I represent Dime Community Bancshares, Inc., a $3.7 billion institution headquartered in Brooklyn, New York. Our primary line of business is multifamily lending in Manhattan, Brooklyn and Queens.

We own approximately $20 million of pooled trust-preferred securities (mostly bank-issuer) which are reviewed quarterly for potential OTTI. We purchased these securities for safety and for yield. They were not purchased as trading securities. Our intention was, and remains, to hold them to maturity. They continue to perform according to their terms.

We believe that footnote disclosure of our investment gives an informed investor adequate opportunity to evaluate the potential negative impact on capital of credit deterioration of these instruments. If the credit deteriorates, we would expect to recognize a charge through earnings at that time.

We believe that marking these instruments using market-based criteria misrepresents their final value to our shareholders. Rather, marking them to a market-based criteria represents a liquidation value.

Marking these instruments to market using market-based criteria would require banks like ours to raise additional capital in the real world for an event which may or may not occur. In fact, it seems the IRS might concur, since only actual losses are deductible for tax purposes.

We appreciate the recent focus of the Financial Accounting Standards Board (FASB) on the important issue of "other than temporary impairment" (OTTI).

We 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.

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

Sincerely,

_____/s/_____

Kenneth J. Mahon

1st Executive Vice President & Chief Financial Officer