



LETTER OF COMMENT NO. 110

To: Adrian Mills; Diane Inzano; Joseph Vernuccio; Kevin Stoklosa; Kristofer Anderson; Mark Trench; Meghan Clark; Peter Proestakes; Russell Golden; Vita Martin; Wade Fanning

Subject: FW: FSP FAS157e

From: Tim Tursick [mailto:TPTursick@msn.com]

Sent: Thursday, March 26, 2009 8:50 PM

To: Stacey Sutay

Subject: FSP FAS157e

I have been reading the comment letters about this accounting rule and it is clear to me that everyone who has commented is connected to the banking industry. It follows that all of their comments will probably be biased toward how the rule or the modification of the rule will benefit them in their professional capacity regardless of the impact on the nation. As a private citizen I feel compelled to submit the following comments and observations about the current state of affairs and any needed changes.

What you must realize is that this rule has affected the entire state of financial health all of the way down to the average citizen or what the financial crowd usually refers to as 'main street'. I admire the reasoning, which seems to be based in fairness, for the accounting rule that requires the effected assets to be marked to market. The problem is that the timing of the rule change brought an entire nation to its knees, whether it was viewed as the right thing to do, or not. I of course am not so naïve as to not see the extent to which greed and typical aggressive wall street behavior and politics has played in this great fiasco. In truth, the entire blame could be set on the door step of Washington DC since it is they who state the rules of the game. You of the federal accounting board are a part of the politics, politics that changed the rules in the middle of the game. I offer anecdotal evidence that shows we are still on the edge of financial collapse and are no where near the edge of recovery unless you guys can begin to see the American forest instead of just the accounting trees.

Commercial real estate is going down the tubes all over the place. There is no doubt it is the next shoe to drop and drop in a big way in this entire real estate melt down. We here on main street have our savings and retirement wrapped up in all of the trappings that the government and Wall Street have offered us for the past 30 years as the defined pension business has been quietly put to sleep. What you do to the accounting rules does not simply affect certain banks with toxic assets that can be further bailed out with my grand kids hard work. What you do will lift a nation up or bring it from its knees to its belly. I am no accountant nor am I a banker. I am a retired U.S. military member who served this nation for twenty eight years. I implore you good people to not get lost in some form of intellectual conceit as you try to decide what is best for the nation. You may never have the opportunity in your life times as professional thinking people to right a wrong which has the power to bring down the financial security of several generations of Americans.

The toxic assets in question are largely based in real estate. Many have been wrapped up and packaged into derivatives and then subsequently insured through credit default swaps. Real estate transactions are typically financed in long term loans, whether they were originally transacted as speculation or not, does not matter at this point. All of these financial institutions that hold these assets must be able to hold them indefinitely without constantly marking them to the market price of any given day. It occurs to me that you must change the current accounting rules to allow these institutions to mark these assets to model. That is your simple and eloquent part to play in helping

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to resolve the draining of wealth from the financial markets, pension plans and equities. The part you play by changing this rule is just the beginning, the rest to be resolved through a clearing house for the said bad assets should the need be there. Nothing will move unless you take this first step. Take it, do the right thing for this country. We are all paying a tremendous price because of this simple mark to market accounting rule and we shouldn't have to. This sinking ship will not come back to the surface unless you take this first sensible step.

Best Regards, T.P.Tursick
Citizen