From: Joanna Bowen Weinreich [jweinreich@mdbankers.com] on behalf of Kathleen Murphy [kmurphy@mdbankers.com]

Sent: Monday, December 29, 2008 10:22 PM

To: Director - FASB

Cc: Kathleen Murphy

Subject: File Reference: Proposed FSP EITF 99-20-a

LETTER OF COMMENT NO. 274

December 29, 2008

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

Via email: director@fasb.org

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:

On behalf of our members, the Maryland Bankers Association (MBA) appreciates the recent focus of the Financial Accounting Standards Board (FASB) on the important issue of "other than temporary impairment" (OTTI). MBA represents over 100 banks, with 1,700 branch offices and over $85 billion dollars in deposits among our charter members (state-chartered banks, national banks and thrifts, and state banks chartered outside of Maryland).

The MBA supports 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 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 the views of our members.

Sincerely,

Kathleen M. Murphy
President and CEO

Maryland Bankers Association

Making Maryland banks stronger and more successful.

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