NewportFed
A better way to bank.

LETTER OF COMMENT NO. 193

December 30, 2008

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

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:

By way of background, our bank is based in Rhode Island and is a $430 million asset sized institution with five offices (soon to be six) in Newport and Washington Counties. 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.

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 request 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,

Kevin M. McCarthy
President/CEO

100 Bellevue Ave.
P.O. Box 210
Newport, RI 02840
tel. 401.847.5500
fax. 401.847.5370

165 East Main Road
Middletown, RI 02842
tel. 401.847.9900
fax. 401.848.7610

121 Old Tower Hill Road
Wakefield, RI 02879
tel. 401.789.9200
fax. 401.783.9331

8 Union Street
Westerly, RI 02891
tel. 401.596.2911
fax. 401.596.3993

2 Wilder Ave.
Westerly, RI 02891
tel. 401.596.5353
fax. 401.596.8043