From: Sent: To: Emily Nikirk [ENikirk@ffsbky.com] Tuesday, December 30, 2008 9:50 AM

Director - FASB

Subject:

File Reference: Proposed FSP EITF 99-20-a

December 30, 2008



LETTER OF COMMENT NO. 288A

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:

Our bank, First Financial Service Corporation of Elizabethtown, appreciates the recent focus of the Financial Accounting Standards Board (FASB) on the important issue of other than temporary impairment (OTTI). We are a \$1.0 Billion bank headquartered in Elizabethtown, Kentucky.

We support the FASBs 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 FASBs 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, Steve Zagar Chief Financial Officer

Emily Nikirk
Administration
First Federal Savings Bank
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