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Technical Director Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, Connecticut, USA 06856-5116 director@fasb.org

LETTER OF COMMENT NO. 102

File Reference: Proposed FSP EITF 99-20-a

Credit Suisse Group ("CSG") welcomes the opportunity to comment on the Financial Accounting Standards Board's ("FASB") proposed Staff Position No. EITF 99-20-a, 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. (the "FSP"). CSG is registered as a foreign private issuer with the Securities and Exchange Commission and its consolidated financial statements are prepared in accordance with accounting principles generally accepted in the United States ("US GAAP").

CSG supports this proposed FSP to amend the special impairment testing rules that apply to certain securitized financial assets. We agree that the proposed rule change will bring the guidance in EITF 99-20 back in line with FAS 115, Accounting for Certain Investments in Debt and Equity Securities, and allow companies to factor in their intent and ability to hold the securities until its value recovers when determining whether to take an impairment charge.

We would welcome the opportunity to further review any changes you may consider to this proposed standard prior to its final issuance. In the meantime, if you have any questions or would like any additional information on the comments we have provided herein, please do not hesitate to contact Eric Smith in New York on (212) 538-5984, or Joanne Phillips on (919) 994-6555.

Sincerely,

Rudolf Bless Managing Director

Chief Accounting Officer

Joanne Phillips Vice-President

Accounting Policy and Assurance Group