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March 23, 2009

Mr. Russell G. Golden
FASB Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

FSPFAS157E

LETTER OF COMMENT NO. 40

File Reference: Proposed FSP FAS 157-e

Dear Mr. Golden:

U.S. Central Federal Credit Union ("U.S. Central") appreciates the opportunity to comment on the proposed FASB Staff Position FAS 157-e, *Determining Whether a Market is Not Active and a Transaction is Not Distressed* (the "FSP").

U.S. Central is a wholesale corporate credit union providing investment and financial products and services to its 26 member corporate credit unions. U.S. Central and its corporate credit union members comprise the Corporate Credit Union Network, which provides investments and financial products and services to the nation's more than 8,000 retail credit unions. U.S. Central, as a primary liquidity provider to the Corporate Credit Union Network, manages a balance sheet of approximately $30 billion.

We applaud last week's actions of the FASB in issuing the two exposure drafts with much-needed clarification and correction.

Specific Responses to Your Questions

1. Is the proposed effective date of interim and annual periods ending after March 15, 2009 operational?

   Yes and no. It is essential that those of us who have not issued final 2008 financial statements be allowed to apply the FSP as of December 31, 2008, in order for our financials statements to not be misleading. This FSP does not result in a change in estimate. It merely provides a better clarification of Statement 157 than was provided with FSP FAS 157-3 in October.

   Please remember that the vast majority of your constituents are not SEC registrants. By making earlier adoption to December 31, 2008 permissible, you would not be discriminating against publicly-traded companies who have already filed their 10-Ks, as they also would have the option to restate their results if they chose to do so.

2. Will this proposed FSP meet the project's objective to improve financial reporting by addressing fair value measurement application issues identified by constituents related to determining whether a market is not active and a transaction is not distressed? Do you believe the amendments to Statement 157 in this proposed FSP are necessary, or do you believe the current requirements in Statement 157 should be retained?

   Yes. With this FSP you have put the "fair" back in valuations, by 1) the return to the notion of a willing buyer *and willing seller,* and 2) re-directing the focus from the excessive liquidity risk premiums reflective of the current, dislocated market to the concept of a *reasonable* profit margin in a non-distressed transaction. It is imperative to allow application of this guidance for December 31, 2008 for a fair presentation of financial results.

3. Do you believe the proposed two-step model for determining whether a market is not active and a transaction is not distressed is understandable and operational?

   It is understandable. It will be cumbersome for large numbers of securities; however given that so many auditors are reluctant to exercise judgment, this level of step-by-step instruction may be a necessary evil.

4. Are the factors listed in paragraph 11 of the FSP that indicate that a market is not active appropriate?

   Yes.

5. What costs do you expect to incur if the Board were to issue this proposed FSP in current form as a final FSP?

   Any costs would be considered negligible and the benefits would far outweigh them.

I may be reached at 913-227-6159 if you have questions.

Respectfully,

Kathryn E. Brick

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