



March 27, 2009

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



LETTER OF COMMENT NO. 195



LETTER OF COMMENT NO. 243

Via email: director@fasb.org

File Reference: Proposed FASB Staff Position NO. FAS 115-a, FAS 124-a, and EITF 99-20-D
Proposed FASB Staff Position 157-e

Dear Mr. Golden:

Thank you for the opportunity to comment on the proposed FASB Staff Position No. FAS 115-a, FAS 124-a, and EITF 99-20-b, *Recognition and Presentation of Other-Than-Temporary Impairments* and the proposed FASB Staff Position 157-e, *Determining Whether a Market is not Active and a Transaction is not Distressed*.

This letter is intended to give support to the key considerations addressed in a letter dated March 24, 2009 from Donna J. Fisher of the American Bankers Association (ABA).

I commend the Financial Accounting Standards Board for continuing to reassess the current impairment accounting model and fair-value accounting model. The proposal, coupled with the additional suggestions by the ABA, would be a significant improvement over the current accounting model.

Sincerely,

Matthew M. Nightingale
SVP, Treasurer & CFO

11 Main Street, PO Box 450, Patten, Maine 04765-0450 • Telephone (207) 528-2211 • Fax (207) 528-2247

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