

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.





Via email:

director@fasb.org

LETTER OF COMMENT NO. 243

File Reference: Proposed FASB Staff Position No. FAS 113-a, FAS 124-a, and E11F 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





