FSPFAS115A

LETTER OF COMMENT NO. 248

GEORGIA CREDIT UNION
Affiliates

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FSPFAS157E

LETTER OF COMMENT NO. 287

March 31, 2009

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

Re: FAS 157-e, FSP FAS 115-a, FAS 124-a, and EITF 99-20-b

Dear Mr. Golden,

The Georgia Credit Union League (GCUL) appreciates the opportunity to comment on the Financial Accounting Standards Board Proposed Staff Position (FSP) FAS 157e, FAS 115-a, FAS 124-a, and EITF 99-20-b. As a matter of background, GCUL is the state trade association and one member of the network of state leagues that make up the Credit Union National Association (CUNA). GCUL serves approximately 173 credit unions that have over 1.75 million members. This letter reflects the views of our Regulatory Response Committee, which has been appointed by the GCUL Board to provide input into proposed regulations such as this.

Summary of GCUL's Position:

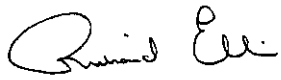
GCUL commends the Board for the continued efforts to provide much-needed clarification regarding the aforementioned announcements. The clarification, in our opinion, will provide a more accurate representation of the economic value of debt and equity investments.

However, because each of these is a further clarification of existing guidance, we strongly believe that the guidance should apply to financial statements for periods prior to March 15, 2009. As proposed, the guidance does not eliminate the inflated decline of corporate credit union capital that is a result of the current market environment. Without the ability to apply the standard retroactively, those with the ability to hold investments to maturity (or recovery) are negatively impacted. At a minimum, we believe that institutions should be allowed to utilize the corrections for December 31, 2008 financial statements. Without this ability, the process of undervaluing investments and

recognizing unrealized losses will simply reverse course in future periods and distort financial results for each period.

Thank you for the opportunity to comment on the proposals. If you have questions about our comments, please contact Cynthia Connelly or me at (770) 476-9625.

Respectfully submitted,



Richard Ellis
Vice President/Credit Union Development
Georgia Credit Union League