LETTER OF COMMENT NO. 40

Subject: FW: File Reference: Proposed FSP EITF 99-20-a

From: Mark Ingalls [mailto:MIngalls@bridgewatersavings.com]
Sent: Monday, December 29, 2008 11:06 AM
To: Director - FASB
Subject: File Reference: Proposed FSP EITF 99-20-a

File Reference: Proposed FSP EITF 99-20-a (*Amendments to the Impairment and Interest Income Measurement Guidance of EITF Issue No. 99-20*)

Dear Technical Director:

Bridgewater Savings Bank is a 136-years-old state-chartered savings bank with $400 million in total assets and seven branches located in southeastern Massachusetts. The management of Bridgewater Savings appreciates the recent focus of the Financial Accounting Standards Board (FASB) on the important issue of "other than temporary impairment" (OTTI).

We support the FASB's Proposed FASB FSP EITF 99-20-a, *Amendments to the Impairment and Interest Income Measurement Guidance of EITF Issue No. 99-20*, which would amend EITF Issue No. 99-20 *(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)*. We urge you to issue the proposal in final form, to be effective for December 31, 2008 financial reporting.

We support the proposal as a first step toward improving the application of OTTI, and we appreciate the FASB's recent decision to examine additional problems relating to OTTI. We agree with the letter from the American Bankers Association to the FASB on the proposal, dated December 28, 2008, which supports the proposal and requests that additional OTTI concerns be addressed for year-end 2008 reporting. OTTI has been controversial for many years, and we believe it would be more meaningful to use a model based on credit impairment rather than on market values. Because of the significance and magnitude of the problems with the application of OTTI in the current market environment, we believe changes to these practices are necessary and prudent for useful and accurate financial reporting for year end 2008 reporting and beyond.

Thank you for your attention to these matters and for considering our views.

Sincerely,
Mark C. Ingalls, EVP/CFO
Bridgewater Savings Bank
756 Orchard St, Raynham, MA 02767-1028
ph: (508) 884-3312 fx: (508) 884-3390

NOTICE OF CONFIDENTIALITY