

3/31/2009

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



LETTER OF COMMENT NO.

229

Via e-mail: director@fasb.org

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



LETTER OF COMMENT NO. 301

Dear Mr. Golden,

First Fidelity Bank is a community bank with assets of \$1.1 billion and 28 locations primarily within central Oklahoma and I appreciate the opportunity to comment on the above referenced FSP's. The American Banker's Association has commented via letters dated March 24th and March 30th and I would like to voice my support for the position taken in both of those letters.

I believe that the threshold to recognize market-related OTTI based on lack of intent to sell is much more practical and representative of the true picture of a "going concern". I don't believe that the purpose of financial statements or the needs of those that use them are to provide a liquidation value of an entity, whether under normal times or under unusual market conditions such as we are suffering now.

I would like to specifically comment on one aspect of the new regulation and that is the effective date. Certainly a March 15, 2009 effective date would be desirable, however another important side of the implementation is the treatment of OTTI taken prior to that date. In much of your documentation, you express the desire for constancy and the need for the reader of financial statements to be able to easily understand the components of the statements. To impose one rule through March 15th and another after that date would certainly lead to great confusion and uncertainty. I would hope that the FSP would include a process that would allow any charge that has been previously taken to earnings under the current rules in excess of the loss attributed to "the credit component" calculated after March 15th be taken back and at the very least be allowed to be moved to other comprehensive income.

A similar point deals with the recovery of OTTI should the factors impacting the "credit component" change. Many of the factors that go in to the calculation of this "credit component" are estimates and judgments based on uncertain events and as such, these assumptions or guesses can be wrong or the environment changes. OTTI should not be a one-way street. Again, to only

allow for write-downs and not adjustments upward appears to me to completely defeat what the FASB is attempting to do, which is provide an accurate picture of an ongoing concern.

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

Sincerely,

Lee R. Symcox
President and CEO