



LETTER OF COMMENT NO. 181

March 30, 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. 229

Via email: director@fasb.org

File Reference: Proposed FSPs FAS 115-a, FAS 124-a & EITF 99-20-b and FSP FAS 157-e

Dear Mr. Golden:

We appreciate the opportunity to comment on the proposals cited and the recent focus the Financial Accounting Standards Board (FASB) has placed on dealing with the valuation and impairment of certain financial assets. Fishback Financial Corporation has five banks in its bank holding company with total assets of \$1.6 billion. All our banks are community banks that use our deposits and capital to lend to businesses in our area. The amount of capital at each bank is an important factor in our ability to make loans in our communities.

We encourage the FASB to act quickly on this matter and request consideration of the following comment.

- Clarification is needed in Proposed FAS 157-e regarding what is a quoted price. Our banks utilize third party pricing services for the valuation of some investment securities. A definition of what constitutes a quoted price and how these pricing services fit into that definition would be helpful.

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

Sincerely,

Fishback Financial Corporation

A handwritten signature in cursive script that reads 'Alan J. Baker'.

Alan J. Baker
CFO