MIDFIRST BANK

March 31, 2009





LETTER OF COMMENT NO. 223

File Reference: Proposed FSP FAS 115-a, FAS 124-a, and EITF 99-20-b, Recognition and Presentation of Other-Than-Temporary Impairments

Dear Mr. Golden:

MidFirst Bank is a \$14 billion federally chartered savings association headquartered in Oklahoma City, Oklahoma. MidFirst strongly supports the changes proposed in FSP FAS 115-a, FAS 124-a, EITF 99-20-b that would amend Statement No. 115, Accounting for Certain Investments in Debt and Equity Securities to make other-than-temporary impairment guidance more operational and to improve the presentation of other-thantemporary impairments in the financial statements.

MidFirst agrees that separating other-than-temporary losses into two components, (a) those due to credit losses and (b) those due to other factors will provide better information to financial statement users. The credit component of other-than-temporary impairment should be recognized in earnings, while the remaining portion should be reflected in other comprehensive income as proposed. This would treat impairments of debt securities due to credit problems in the same manner as loan impairments. The noncredit impairment for held-to-maturity securities should be reflected in the footnotes to financial statements to disclose the fair value of the securities.

MidFirst strongly supports changing the management assertion about the ability to hold a security to one focused on the intent to sell (with an assertion as to whether it is more likely than not that the security will be sold before its recovery). MidFirst believes this should apply to both debt and equity securities (such as mutual funds that are composed of debt securities). In our view this change better reflects management's perspective and decision process regarding investment holdings.

MidFirst agrees that the effective date for changes should be for interim and annual periods after March 15, 2009. However, we strongly urge the FASB to allow restatement of financial statements or an opportunity to "true-up" other-than-temporary impairments recorded in prior periods to enable users to more easily compare statements for different periods.

MidFirst urges the FASB to permit the recognition or valuation adjustment of subsequent recoveries. If securities may be written down when impairments occur, reversals through

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earnings should be permitted when it becomes clear that an impairment has decreased or no longer exists. This would more accurately reflect an instrument's true fair value. Otherwise, an institution may be understating its financial position.

MidFirst appreciates the FASB's efforts to improve accounting guidance on other-thantemporary impairments to more accurately reflect the valuations of debt and equity securities and urges the FASB to quickly move to approve the new guidance.

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

Sincerely,

Steve Martin

Senior Vice President and

Controller