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To: Director - FASB

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The problem for the Public is in understanding the swings in these illiquidity waves and why the Public is expected to bail out institutions that participate in such high risks.

Why should one method remain when its wide swings produce a gambling effect and not a hedge against risk.

The Federal Funds Effective Swap Rate is a private swap rate based on a system that has absorbed previous losses.

We, the Public, need accountability. How can we rely on an OIS that has no reliable liquidity or no Disclosures to determine factors.

'What tests are in place. What comparisons are in place. Where can we eliminate manipulation of the marketplace and expect a marketplace without major bubbles or catastrophic surprises.

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