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LETTER OF COMMENT NO. 3A

July 21, 2006

VIA EMAIL (director@fasb.org)

Director Financial Accounting Standards Board Emerging Issues Task Force

RE: <u>EITF0604 – Comment Regarding Accounting for Deferred Compensation and</u>

Postretirement Benefit Aspects of Endorsement Split-Dollar Life Insurance

Arrangements

To Whom It May Concern:

I want to express my strong opinion that this proposed rule simply does not make sense. If this recommended accounting change is in response to Enron-style abuses, then I believe it is completely off-the-mark. If Franklin Savings Bank is required to accrue for these benefits in the proposed fashion, we will very seriously have to consider eliminating the benefit due to the financial burden imposed. Furthermore, it doesn't make sense that we would have to book an expense twice for the same benefit – once for the mortality charges and once for the pre-retirement accrual – both of which represent the present value of the expected death benefit.

I sincerely hope that the FASB will make the appropriate decision to reject this accounting proposal.

Sincerely,

Ronald L. Magoon SVP, COO, CFO & Treasurer