

March 30, 2009

Mr. Russell G. Golden FASB Technical Director Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5166



RE: Proposed FSP FAS 157-e

Determining Whether a Market Is Not Active and a Transaction is Not Distressed

Dear Mr. Golden:

On behalf of the Credit Union Association of New York, I would like to take this opportunity to voice our strong support for the proposed amendments to Financial Accounting Standards 157-e. By permitting securities to be valued in a manner that more accurately reflects the price that a willing buyer and willing seller would agree to in a non-distressed market it provides more accurate information to readers of financial statements and enables a true reflection of asset values by eliminating the need to have those values include the significant liquidity risk premium under current accounting principles.

Current accounting rules simply provide too blunt of an instrument with which to reflect the value of securities and these proposals would go a long way toward addressing this problem. For example, by allowing for values that reflect the price in a non-distressed market, institutions would be not be required to reflect the liquidity risk premium which is driving the prices well below levels that a willing seller would entertain, especially if the institution has the ability to hold the securities until their value recovers.

We also support changes that make the proposal applicable to 2008 financial statements. Since these changes are considered a clarification to the original FAS 157 a retroactive application should be allowed. All institutions should have the ability to restate, re-audit and re-file if they choose to do so.

Thank you in advance for considering these recommendations.

Sincerely.

William J. Mellin President/CEO