LETTER OF COMMENT NO. 22

Subject: FW: File Reference: Proposed FSP EITF 99-20-a

From: Randy Foraker [mailto:rforaker@bancfirst.com]
Sent: Monday, December 29, 2008 9:22 AM
To: Director - FASB
Subject: File Reference: Proposed FSP EITF 99-20-a

December 29, 2008

Technical Director
Financial Accounting Standards Board
301 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Via email: director@fasb.org

File Reference: Proposed FSP EITF 99-20-a (*Amendments to the Impairment and Interest Income Measurement Guidance of EITF Issue No. 99-20*)

Dear Technical Director:

BancFirst Corporation is a publicly traded financial holding company located in Oklahoma City, Oklahoma. Our primary subsidiary is BancFirst, a state chartered bank with $3.8 billion in assets. We appreciate the recent focus of the Financial Accounting Standards Board (FASB) on the important issue of "other than temporary impairment" (OTTI). We believe that accounting and financial reporting should reflect how the business is managed. Financial information is most meaningful when it reliably and consistently reports the economic results of how the business is operated. The results of operations of a going concern should not be distorted by artificially recognizing gains and losses that are not consistent with how the business is managed. Consequently, assets that are held for investment, rather than for sale, should be carried at a value that is representative of the amounts that will be received through the course of holding the asset, rather than a current market price which may be significantly affected by irrelevant external factors, such as a distressed market. Permanent write-downs of assets held for investment should only be realized if it is probable that all of the expected cash flows will not be received, which would normally be the result of credit deterioration of the obligor.

We support the FASB's Proposed FASB FSP EITF 99-20-a, *Amendments to the Impairment and Interest Income Measurement Guidance of EITF Issue No. 99-20*, which would amend EITF Issue No. 99-20 *(Recognition of Interest Income and Impairment on Purchased Beneficial Interests and Beneficial Interests That Continue to Be Held by a Transferor in Securitized Financial Assets)*. We urge you to

issue the proposal in final form, to be effective for December 31, 2008 financial reporting.

We support the proposal as a first step toward improving the application of OTTI, and we urge the FASB to examine additional problems relating to OTTI. We agree with the letter from the American Bankers Association to the FASB on the proposal, dated December 28, 2008, which supports the proposal and requests that additional OTTI concerns be addressed for year-end 2008 reporting. OTTI has been controversial for many years, and we believe it would be more meaningful to use a model based on credit impairment rather than on market values. Because of the significance of the problems with the application of OTTI in the current market environment, we believe changes to these practices are critical for year-end 2008 financial reporting.

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

Sincerely,

Randy Foraker
Executive Vice President
and Chief Risk Officer
BancFirst Corporation

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