LETTER OF COMMENT NO. 24A

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Anita M. Florek
Executive Vice President
& Chief Financial Officer

December 29, 2008

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

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

Dear Technical Director:

I am the Chief Financial Officer of Smithtown Bancorp and I greatly appreciate the recent focus of the Financial Accounting Standards Board (FASB) on the important issue of "other than temporary impairment" (OTTI). Bank of Smithtown has been a high performing bank for many years, with no subprime credit issues and strong asset quality. In spite of the current economic downturn we have performed well this year. It is only due to the current OTTI issues that we may be forced to write down assets that have not shown increasing significant credit impairment, but whose market value is virtually zero due to current distressed markets.

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 appreciate the FASB's recent decision to examine additional problems relating to OTTI. We agree with the letter from the American Banker's 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 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 financial reporting.

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

Sincerely,

Anita Florek
EVP and Chief Financial Officer
Smithtown Bancorp, Inc.