

# EUREKA HOMESTEAD

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March 31, 2009

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



LETTER OF COMMENT NO. 161

Via email: [director@fasb.org](mailto:director@fasb.org)

RE: Comments on Proposed FSP FAS 115-a, FAS 124-a, and EITF 99-20-b: *Recognition and Presentation of Other-Than-Temporary Impairments*

Dear Mr. Golden:

We are Eureka Homestead located in Metairie, Louisiana. We have \$114 million in total assets and have 2 branches located in the greater New Orleans area. As a community based financial institution, we appreciate the interest you have shown in this important matter.

We appreciate the opportunity to comment on the Proposed FSP FAS 115-a, FAS 124-a, and EITF 99-20-b, *Recognition and Presentation of Other-Than-Temporary Impairments* ("proposed FSP"). We commend the FASB's efforts to improve guidance relating to other than temporary impairment: ("OTTI") and we wish to provide comments on the Proposed FSP.

Overall, we support the Proposed FSP. Specifically, we believe that the threshold to recognize market-related OTTI based on the lack of intent to sell (management asserts that it does not have the intent to sell the security, and it is more likely than not that it will not have to sell the security before its recovery) is certainly more operational than the current requirement. We also strongly agree with the proposal to recognize only credit losses through earnings.

We believe that the Proposed FSP is more consistent with the "ongoing-entity" principal than the current guidelines of recognizing through earnings losses that would be more consistent with a "liquidation" model.

We also believe that the recognition is parallel to the treatment of loans in that only the credit impaired amount would be recognized through earnings.

We believe that it is crucial that the guidance be made effective for the periods after March 15, 2009. If it is possible to consider these changes to be effective retroactive to December 31, 2008, that would be even better.

[www.eurekahomestead.com](http://www.eurekahomestead.com)



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Thank you for the opportunity to comment on these important matters.

Yours truly,

A handwritten signature in black ink, appearing to read 'Cecil A. Haskins Jr.', followed by a long horizontal line extending to the right.

Cecil A. Haskins Jr., CPA  
Chief Financial Officer