



April 1, 2009

Mr. Russell Golden 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 FAS 157-e, Determining Whether a Market Is Not Active and a Transaction Is Not Distressed

Dear Mr. Golden:

The Pennsylvania Bankers Association (PBA) representing approximately 176 insured financial institutions in the Commonwealth appreciates this opportunity to register its full support for the comments supplied by the American Bankers Association (ABA) in its March 30, 2009 letter on the subject noted above *attached*.

PBA and the ABA agree that fair value accounting (mark to market accounting, or MTM) for banking institutions often provides misleading information to users of the financial statements as the current market has clearly demonstrated. Although SFAS 157 required no additional use of fair values, it resulted in a new definition of fair value that has not worked effectively. Some believe the problem is the standard itself, while others point to a litigious environment that forces reliance on the lowest tangible quotes. In any case, we appreciate the FASB's efforts to make improvements to the guidance for estimating market values in illiquid markets.

PBA has encouraged its members to provide you with specific examples of the problems they have faced under the current standard (to the extent the public nature of your comment process and regulatory restrictions allow).

Jan & Buy

Enc. (1): ABA 3-30-09 Fair Value comment letter