



March 30, 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

RE: Preliminary 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:

The Pennsylvania Bankers Association 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 in its March 24, 2009 letter on the subject noted above attached.

PBA's members are deeply concerned that the current accounting rules regarding recognition and presentation of other-than-temporary impairments have exacerbated the problems financial institutions face in the current economic crisis. These rules merit immediate revision as ABA has recommended in order to prevent further damage.

PBA has encouraged its members to provide you with specific examples of the problems these rules have caused (to the extent the public nature of your comment process and regulatory restrictions allow). We strongly urge you to consider their specific illustrations comments and follow up should you need further information.

Sincerely,

Jam & Bug

Enc. (1): ABA 3-24-09 OTTI comment letter.