Stacey Sutay

LETTER OF COMMENT NO. 139

From: Mortimer O'Shea [moshea@hilltopcommunitybank.com]

Sent: Monday, December 29, 2008 4:06 PM

To: Director - FASB

Cc: rwellbro@optonline.net; Detlef Felschow; Ronald Severino; Walter Wojcik

Subject: Proposed FSP EITF 99-20-a

Dear Technical Director:

I am writing as the President & CEO of Hilltop Community Bank and Hilltop Community Bancorp, Inc., both of which are headquartered in Summit, New Jersey. As you can imagine, we are very concerned about the OTTI issues that have been the subject of much recent discussion in the financial community.

We support the proposed FASB FSP EITF 99-20-a which would amend EITF Issue No. 99-20 and urge you to issue the proposal in final form, to be effective for year end reporting.

We believe the proposal is a good first step towards improving the application of OTTI, and we appreciate FASB's recent decision to examine additional problems relating to OTTI. You recently heard from our trade group, the American Bankers Association, and we concur with the points they made in their letter to you. We believe that it would be more meaningful to use an OTTI model based on credit impairmant than on market values at a time when traditional markets are not functioning.

Thanks for your attention to our point of view.

Sincerely,

Mortimer J. O'Shea, President & CEO
Hilltop Community Bank, Summit, NJ