Letter of Comment No: 3
File Reference: 1225-001

----Original Message-----

From: Oak Creek Valley Bank [mailto:oakcreek@inebraska.com]

Sent: Wednesday, October 05, 2005 9:28 AM

To: Director - FASB **Cc:** grochala@icba.org

Subject: FAS 140 (file reference 1225-001)

Dear Mr. Director: Our small community bank of 40-45 MM in assets relies heavily on loan participations. Both those that we sell out (over and above our loan limit on larger customers) and those we purchase to help spread our risk and to help earnings. Any change in the rule relating to accounting which negatively affects our ability to continue to handle these as we currently do will have a very negative effect on our bank and on our local farming community of 500 people. I strongly urge you to continue the current sales accounting treatment for these loan participations.

Mark Blazek, President Oak Creek Valley Bank Valparaiso, Nebraska