



Independent Bankers' Bank

August 2, 2006



LETTER OF COMMENT NO.

114

Mr. Lawrence W. Smith (email to jerichter@fasb.org)
Chairman of Emerging Issues Task Force
Financial Accounting Standards Board
401 Merritt 7
Norwalk, Connecticut 06856-5116

Chairman Smith:

I am the President and Chief Operating Officer of Independent Bankers' Bank and have reviewed the information regarding EITF Issue No. 06-4, "Accounting for Deferred Compensation and Postretirement Benefit Aspects of Endorsement Split-Dollar Life Insurance Arrangements" in order to evaluate the impact of the EITF's proposed consensus on our bank.

I am very concerned that the accrual expenses, especially the reduction to retained earnings, will cause a significant impact on our bank and all other financial institutions that have purchased this product in previous years. The proposed consensus creates not only a change in accounting in the future, but forces a change in the accounting method for past decisions that were made based upon widely accepted accounting practices at the time of those decisions. This is not a fair and just method of adjusting the accounting in my opinion. Many bankers are unaware of the potential impact of the proposed consensus and as a result will be extremely surprised when they do realize the impact. Independent Bankers' Bank's reduction to retained earnings is estimated to be \$3,325,000.00. Seeing our regulatory capital ratio and legal lending limit decline, due to this proposal has a negative impact on our bank, our legal lending limit, and therefore our customers as well.

I am also concerned that the accrual expenses for a benefit that, by agreement, is an obligation of an insurance company and not the bank, has to be accounted for on the bank's balance sheet and may, in fact, misrepresent the bank's liability. Why should the bank have to post an expense for a benefit and then reverse the expense for the same benefit when the insurance carrier has been paid by the bank to satisfy the benefit? The bank is not being paid the cost of the benefit by the insurance carrier at the time of the death of the insured employee or director. The beneficiary of the insured employee or director is being paid by the insurance carrier according to the agreement between the bank, the insured employee or director and the insurance carrier. As a result, the liability

3161 W. White Oaks Drive
Suite #300
Springfield, IL 62704
800-422-0734
Fax 677-409-2262

100 S. Fourth Street
Suite #930
St. Louis, MO 63102
888-829-2663
Fax 314-588-0044

20 Martingale Road
Suite #225
Schaumburg, IL 60173
800-422-0734
Fax 877-409-2262

3200 Fishback Road
Suite #30
Carbondale, IL 62901
618-457-4850
Fax 618-529-7612

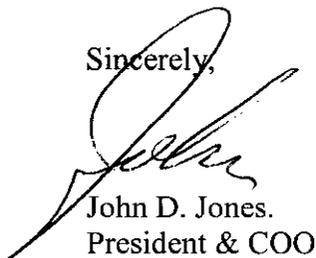
for the payment lies with the insurance carrier, not the bank. If the liability were deemed to even momentarily reside with the bank due to a remittance arrangement, would there not need to be a future asset booked as well that would offset the liability?

I do not understand the logic behind the proposed consensus and disagree with the accounting changes it will create. It does not appear to be logical or reasonable to duplicate expenses by recording both the cost of insurance coverage and the death benefit that is being provided by the insurance coverage. The proposed consensus also causes many other issues that will have to be addressed by the bank such as income tax reporting, cash flow statement reporting and the matching (or potential mismatching) of assets to liabilities. These will create more time and expense for the bank without any resultant gain in financial statement transparency. I firmly believe that accounting statements should properly represent the bank's financial condition. Duplicating the posting of an expense, only to reverse the accrued liability when the benefit is paid, will do nothing to make my bank's financial statement any clearer to those who need to rely on its information.

Although I am not an accountant, I feel that accounting should be based on factual, not perceived evidence of income and expenses and I recommend that the Financial Accounting Standards Board either spend more time evaluating the impact as well as the logic of the proposed consensus, or preferably, decide to forgo adopting the proposed consensus.

I appreciate the opportunity to comment, and I also thank you for your time and consideration on this very important matter to Independent Bankers' Bank.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Jones", written over a white background.

John D. Jones.
President & COO

JDJ:ses