From: Tom Huber
To: Director - FASB

Subject: File Reference: No. 1700-100 Disclosures about the Credit Quality of Financing Receivables and the Allowance

for Credit Losses

Date: Tuesday, August 18, 2009 12:30:26 PM

Director,

I'm writing to ask that you not issue these accounting standards. Most small banks (we are \$160,000,000) do not have the manpower to implement these standards. The amount of time currently required to analyze the adequacy of our allowance is already a burden. Adding additional levels of analysis will not benefit our bank. If you do pass this burdensome requirement, we could not have the necessary reporting changes made by 12/31/09. If the intent of these new disclosure is to aid investors, then the new disclosure have no value to mutual institutions. Every crisis brings over-regulation. This appears to be a prime example.

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