From: Mark Wiebe
To: Director - FASB

Subject: Mark to Market Accounting

Date: Tuesday, June 22, 2010 3:52:02 PM

Dear Director,

I would ask that you reconsider your proposal to mark loans and deposits to market on the face of bank financial statements. First, we already show "fair values" within our footnotes, so if an investor wants that information it is already available. Second, by the nature of our business we hold loans and deposits to maturity. For the same reasons we have not marked securities "held to maturity" to market, we should not do so with loans and deposits. It does not matter what we could sell the assets for at any given time if we have no intention of selling them. All this does is create swings in income based on factors that would not necessarily affect these accounts. Third, these types of accounts are not homogeneous. There are not the types of markets we can look to for current market values. This creates speculation by the bank as to the true value of an account. This would put more doubt in investor's minds as they do not know how the bank came up with their values. Finally, I believe that mark to market accounting had a lot to do with the financial crisis we are currently in. Mark to market accounting makes things look worse than they are in bad times and better than they are in good times. It will also cost banks a lot of money to hire people and systems to come up with these values. These are not the times to be adding further burden to banks that are trying to recover from the worst economy since the great depression. I hope you will consider these thoughts and reverse this proposal.

Sincerely,

Mark A. Wiebe, CPA Senior Vice President Chief Financial Officer State Bank of Cross Plains