June 23, 2010

Mr. Russell Golden
Technical Director
Financial Accounting Standards Board
301 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

File Reference: No. 1810-100 Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities

Dear Mr. Golden:

I am an investor and Board member of Northwest Bank in Oregon. I wanted to express my opposition to the portion of the proposal that requires all financial instruments to be marked to market.

Our bank's loan and asset/liability committees do not believe that mark to market is relevant for most commercial loans since they are not being sold. As you know, in this current economic climate, loans which are capable of being sold but have no pool of buyers to draw from creates an impossible task of trying to figure out what the mark to market might be. We have already written down every suspect loan to what we believe are true market values by using multiple appraisals and external portfolio auditors. Additionally, regulators have concurred with our values.

Most community banks are fighting for every cent of capital these days. If we have to adopt this proposed portion for mark to market, it could negatively impact our balance sheet without being an accurate indication of the true fair value of the assets.

I view this portion of the proposal to be an overreaction to a loan's true value. In this time of overregulation, we do not need another layer of audit activity and the costs associated with it. I implore you to drop your proposal to mark loans to market since it will not benefit any party involved.

Sincerely,

Bruce Burns

Director and Investor

Northwest Bank

Lake Oswego, OR 97035