

## 5243 Panorama Terrace

Panora, IA 50216

www.russellconsultinggroup.net

July 6, 2010

Mr. Russell Golden Technical Director FASB 401 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:

Thank you for the opportunity to comment on the exposure draft *Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities* ("proposal").

My business provides financial and marketing consulting to farmers and ranchers throughout America. My concern is Mark to Market will limit loans banks make to farmers and small business owners as there is no current open market for operating loans to these businesses. Consequently I am concerned banks will not make these loans and instead invest in something like housing loans that are more readily marketable. That will limit economic growth and the viability of the US economy.

Additionally, I am very concerned about the costs and resources that will need to be dedicated to produce and audit such data for banks which will raise rates to farmers and small businesses.

With this in mind, I recommend you to drop your proposal to mark loans to market.

Thank you for considering my views.

Moe Russell

President

Sincerely