

Tensas State Bank

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Technical Director
Financial Accounting Standards Board
401 Merritt 7, P.O. Box 5116
Norwalk, CT 06856-5116
File Reference No. 1810-100

To Whom It May Concern:

FASB's proposed Mark to Market Accounting Plan should not apply to community banks. Particularly, Tensas State Bank funds our operations by taking deposits and holding loans for the long term which are not intended as readily marketable instruments. Because of this business practice, we do not underwrite or package our loans for resale in the secondary market therefore fair value determination would be misleading to investors. Additionally, we do not sell loans when the borrower is experiencing financial difficulty; instead we work out the loan situation with the borrower. To reflect a fair value as part of capital is to mislead the financial statement user. This being especially true in today's environment when market volatility is significant.

We are not a publicly traded financial institution. Fair value accounting would be cumbersome and expensive to incorporate and is just not necessary. Increased external audit fees, audit committee time and increased internal audit procedures with no benefit further negate the need for Mark to Market accounting.

Sincerely,



Roxanne B. James, CPA
Senior Vice President/CFO