From:
 Doug Smith

 To:
 Director - FASB

 Cc:
 "Craig Gengler"

**Subject:** Fair Value Accounting Changes

Date: Friday, September 10, 2010 5:28:56 PM

With great disappointment I send this letter to address the proposed changes as it pertains to "Fair Value Accounting Changes". We are a \$50 million bank in western Illinois. We do not partake in high tech financial products that require complex accounting practices. We have never participated in derivatives or hybrid investments. It is difficult to understand when rules and regulations change that they are done with little or no consideration to the smaller banking institutions. One cannot help but wonder if the ultimate goal of government and or FASB is to encourage small banks to sell out to larger banks that have the staff and technical resources to address complex accounting changes. Having worked in the community banking industry for nearly 24 years I see no benefit to any organization for the implementation of this proposal on community banks.

Therefore I ask that we utilize a very old and little used tool called common sense and that this proposal be eliminated from the community banking system. We are already over burdened with regulations and find it difficult with our limited staff to comply. Since I have never worked in a "Too Big To Fail Institution" I am not asking that this proposal be eliminated from implementation in large banking institutions as I do not feel qualified.

Thank you for your consideration to my opinions regarding this proposal and I plead that you do not implement this proposal on community banks.

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