From: <u>Trimble, Susan</u>
To: <u>Director - FASB</u>

Subject: File Reference No. 1810-100

Date: Wednesday, September 15, 2010 11:48:17 AM

September 15, 2010

Technical Director
Financial Accounting Standards Board
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 Sir:

Thank you for the opportunity to comment on exposure draft *Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities.* I am writing on behalf of the Bank of Ocean City to express our opposition to the proposal, specifically the requirement that all financial instruments be marked to market.

This proposal does not support our business model of holding loans to maturity. Without a readily available market for our loans, the bank would have to incur high costs to estimate the loans at fair value. In addition, audit fees will increase to incorporate the new valuation. All of these costs, with little or no benefit to our investors. The potentially large fluctuations in the valuations will cause more confusion and make ongoing comparability much more difficult.

While we understand the overall intention of the proposal, it will only serve to be more burdensome to community banks and create less understanding among investors. We hope you will reconsider your position on this proposal and appreciate the opportunity to comment.

Sincerely,

Susan E. Trimble, CPA Accountant Bank of Ocean City 627 William Street Berlin, Maryland 21811 Phone: 410-641-2228

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