



**First Interstate BancSystem, Inc.**  
401 N. 31st St.  
P.O. Box 30918  
Billings, MT 59116-0918  
406-255-5390  
Fax: 406-255-5350  
www.firstinterstatebank.com

September 10, 2010

Mr. Russell Golden  
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 Mr. Golden:

I am writing to express opposition to the proposal of marking loans to market. I am concerned that imposed volatility of such an activity would distract from the true performance of the loan asset and skew the amount of capital truly needed to support loan performance risk. I believe it would hinder, not help, in reporting the true financial condition of our banking system.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark L. Bauer', written over a horizontal line.

Mark L. Bauer  
Credit Officer  
First Interstate BancSystem, Inc.  
401 N. 31<sup>st</sup> Street  
P.O. Box 30918  
Billings, MT. 59116-0918