From: <u>ben.h@fsbankgroup.com</u>

To: <u>Director - FASB</u>

Subject: File Reference: No. 1810-100, "Accounting for Financial Instruments and Revisions to the Accounting for

Derivative Instruments and Hedging Activities"

Date: Thursday, September 16, 2010 10:13:04 AM

Bennett Hillesheim PO Box 429 Renville, MN 56284-0429

September 16, 2010

Russell Golden Technical Director Financial Accounting Standards Board 401 Merritt 7, PO Box 5116 Norwalk, CT 06856-5116

Dear Mr. Golden:

I am Branch President of First Security Bank-Sleepy Eye in our Renville office. Our banking institution has \$155 million in total assets, I am writing to express my opinions on specific provisions of the exposure draft.

I am strongly opposed to the portion of the proposal that requires all financial instruments - including loans - to be reported at market value on the balance sheet.

There is no active market for our loans, and estimating a market value makes no real sense.

Even if we could easily obtain a market price, the loan is just one part of our financial relationship with the customer.

The costs and resources that we will need to comply with this new requirement would be significant, while generating nothing of value.

For the reasons stated above, our bank respectfully requests that the fair value section of the exposure draft be dropped.

Very Sincerely,

320-329-8373 Branch President First Security Bank