1810-100
Comment Letter No. 1260

501 Corrigan Dr.
Johnstown, PA 15904

September 21, 2010

Mr. Russell Golden
Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Dear Mr. Golden:

I enjoy investing in financial stocks and have bank stocks in my personal portfolio, retirement accounts, and an investment club of which I am a member.

The proposal to mark loans to market does not seem to make financial sense for investors. Asset quality, such as non-performing loans, charge-offs, delinquencies, and yields are solid barometers of a bank's loan portfolio. Loans are usually held until paid by the borrower so marking it to a market value would not help me in determining to purchase or sell a bank stock.

In fact, mark-to-market on investments has an unintentional effect of causing swings in a bank's capital. When bonds fall out of favor, either because of yields or maturities to the general market, almost all banks have unrealized losses in their capital calculations. This is not of great value to me. Doing the same for loans would be even worse.

Please drop your proposal to mark loans to market for bank accounting.

Thanks for your consideration of this matter.

Sincerely,

Elmer C. Laslo

Elmer C. Laslo

ECL:lkw