September 22, 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 Members of the Financial Accounting Standards Board:

Thank you for the opportunity to comment on the above exposure draft. I am the CFO of a 1.1 billion dollar financial institution in Dallas, Texas. I am actively involved in our bank's management and in preparing the financial reports for our shareholders as well as our regulators. I am writing today to express concern with and opposition to FASB's proposed changes to the way we mark our financial instruments; namely, the expansion of fair value accounting to all financial instruments.

North Dallas Bank & Trust operates in a traditional bank model by holding our financial instruments for long term investment purposes, not for trading purposes. Forcing banks to account for long-term investments at fair value will result in significant change to capital due to the lack of an active market for a portion of our assets. These rules will lead to decreased lending and shorter term loans due to the uncertainty of the value of non-performing as well as performing loans.

The costs to the bank in order to provide for these fair value estimates at what appears to be of no benefit to the customer, the investor or the bank will increase significantly. We anticipate we would have to hire more staff or consultants to estimate the fair values and pay a higher audit fee to our independent audit firm. The fluctuation of capital will confuse many of our shareholders as well as customers. We feel the current measurement of the bank's strength is fairly represented by using the current accounting standards. The bank is an on-going entity and should not be measured at liquidation value.

1810-100 Comment Letter No. 1514

We support our national trade association (the American Bankers Association) and our state trade association (Texas Bankers Association) responses to the proposal being offered. As a CFO and an investor, I believe the additional information requested through the proposal will not benefit the investment community.

Thank you in advance for your time and careful consideration of the above. It is our request that FASB withdraw this proposal.

Respectfully,

Sam Renshaw Sr. Ex VP & CFO