September 29, 2010

Russel Golden, Technical Director Financial Accounting Standards Board

Subject: Comments on No. 1810-100

Dear Mr. Golden,

Thank you for the opportunity to comment on FASB's Exposure Draft: Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities.

I am writing to urge FASB to not go forward with the proposal. We oppose the proposed accounting treatment for core deposits which calls for them to be regularly remeasured using a present value calculation. We also oppose requiring fair value calculations for loans that are held for the long-term to collect cash flows. This would not provide accurate information and the calculations would be expensive and time consuming, particularly for smaller banks like ours that have limited staff resources to conduct the analysis.

Security Bank & Trust Co is a \$243 million dollar bank located in the rural community of Glencoe. The bank is already burdened with a multitude of new regulations passed during the previous 6 years and adding this requirement only places additional cost and stress to our operation. The time and effort to implement this proposal is substantial and provides no additional benefit to the customers we serve and quite possibly will lead to less credit being available in our local community as we try to balance the effect this would have on determining the value of the deposits and loans that we handle.

I urge you to stop your consideration of this expensive unnecessary proposal.

Sincerely

Jeffrey A. Grant, SrVP