

From: [Jay Estes](#)
To: [Director - FASB](#)
Cc: [Eric Sandberg](#); [Cliff Miller](#)
Subject: FASB Loan Mark to Market
Date: Thursday, September 30, 2010 5:48:37 PM

Sir,

As President of a Community Bank I am actively involved in our bank's management including reviewing financial results. This proposed rule will place an enormous and ridiculously expensive burden to institutions similar to mine. Further, it will add little or no value to the true financial position of any Community Bank.

We hold our commercial loans and do not sell them. Residential loans that we consider "in house" are typically non-conforming rural properties (with acreage) that serve our customers. These "mom and pop" business loans and rural properties would be 1) extremely burdensome and difficult to value 2) have little marketability in any type of secondary market.

Understandably, FASB's intent would appear be to provide consistent accounting. Large Banks that package and trade wholesale blocks of these assets- or in recent history subprime loans- may should conduct accounting procedures of this nature. But this one size fits all proposal is not appropriate to any other institution that does not engage in anything less.

Please withdraw this awful proposal.
Sincerely,

Jay Estes
President
Peoples State Bank
Shepherd TX

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