

September 22, 2010

Financial Accounting Standards Board P.O. Box 5116
Norwalk, Connecticut 06856-5116

Dear Members of the Financial Accounting Standards Board:

We are a \$1.2 billion asset community bank employing 250 hard working Americans and serving over 30,000 customers. The purpose of this letter is to express our bank's deep concern with and opposition to FASB's proposed changes to the methodology of how financial institutions like ours mark their financial instruments, in specific the expansion of fair value accounting to all financial instruments. The impact of the FASB proposal will greatly hinder or reduce our bank's future ability to employ fellow Americans and to provide valuable banking services to serve our customers.

Our concerns are also being shared by other peer bank executives; we strongly feel that changes proposed in No. 1810-100 will be a large step backward towards helping our community banks to contribute to the recovery of the general economy in this country. Commercial banks like most of us hold financial instruments like loans for long-term investment purposes and not for trading purposes. Forcing our banks to begin accounting for long term investments at fair value will result in a significant change to our capital because most of these assets have no active markets. There will also be significant costs in order to provide these fair value estimates with zero benefit to our stakeholders, including our customers, the main street of America.

Respectfully we are asking you to withdraw your proposal, one that may bring severe damage to our community bankers and thus the general public whom we serve.

Sincerely,

George M. Lèe

Executive Vice Chairman & CEO

CC: Kay Bailey Hutchison, U.S. Senator, Texas

John Cornyn, U.S. Senator, Texas

Al Green, U.S. Representative, Texas 9th District