From: rconway@ucbnd.com
To: Director - FASB

Subject: Comments on No. 1810-100, "Accounting for Financial Instruments and Revisions to the Accounting for

Derivative Instruments and Hedging Activities" Exposure Draft

**Date:** Monday, September 20, 2010 4:03:17 PM

Randy Conway 6701 25th Ave NW Minot, ND 58703-8835

September 20, 2010

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

Dear Mr. Golden:

I am writing to urge FASB to not go forward with the proposal for several reasons.

Conservative community bankers see the need for more flexibility in setting the allowance for loan and lease losses. We are all well aware that economic cycles occur and it is very difficult to absorbing losses and raising capital during times of economic difficulties. In fact, I believe it promotes rapid swings in valuations that could create even more trouble in good or bad times.

We oppose the proposed accounting treatment for core deposits which calls for them to be regularly remeasured using a present value calculation. 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.

Thank your for the opportunity to comment on this proposal.

Sincerely,

Randy Conway Vice President, United Community Bank Minot, ND

Sincerely,

Randy Conway (701) 721-0119