1810-100 Comment Letter No. 1998

From: john@bankofdc.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: Tuesday, September 21, 2010 1:32:32 AM

John Kingsbury P.O. Box 570 Ponca, NE 68770-0570

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:

Thank you for the opportunity to strongly oppose FASB's proposed Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities.

This accounting result from this proposal would greatly misrepresent the financial condition of our bank and other community banks. It simply does not make sense to paint an entire financial lindustry with one large brush.

Rules and regulations, including all these new accounting standards and more will ruin small banks ablity to survive, and they already restrict business and loan growth. The costs far exceed any benefit especially for small, closely held, non-public community banks. This is total over kill in our world.

The result will be fewer and fewer community banks serving local and especially rural areas. Big government and excessive rule-making are killing rural America at the same time big government spends billions of dollars to Save Rural America.

Community banks fund their operations by taking deposits and holding loans for the long term. Most financial instruments this bank holds are not readily marketable.

These accounting changes will increase the volatility of bank balance sheets, forcing them to face higher capital requirements or decrease lending at a time when regulators are calling for more capital and our economy needs more, not less, credit availability.

Someone needs to consider and more fully understand how MOST of the U.S. economy and most of the thousandss of community banks operate to understand that ONE SIZE, DOES NOT FIT ALL.

If we continue to restrict and stifle our economy and our businesses in so many complex ways, there will be no economic recovery. Someone needs to listen to the small businesses that create jobs, and that includes if not

starts with community banking.

For what it's worth, I have forty years experience in community banking and economic development. Please help stop the disaster we face. Please do not continue to accelerate it. Please understand concerns such as mine are very real. I am not a lobbyist or an industry spokesperson, I am a community banker with a full understanding of main street reality.

Sincerely,

John Kingsbury 402-755-2224