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Tim Turbeville
Executive Vice President & COO

September 22, 2010

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

File Reference: No. 1810-100 Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities

Dear Members of the Financial Accounting Standards Board:

I am writing today regarding concerns and opposition to FASB's proposed changes to the way financial institutions will be required to mark our financial instruments. This proposed standard does not provide benefits to community banks and those we serve due to the nature of our business.

I am actively involved in our banks management including reviewing financial results and unless a loan is not performing, we do not discuss the market value of loans.

We hold our commercial loans and do not sell them. We are a bank striving to serve individuals and businesses (usually small businesses) in our community which creates limitations in the marketability of our loans in the secondary market.

We tend to try work out problem loans and therefore do not sell them.

There would be little benefit for the significant added accounting and human resources required to comply. We are already dealing with new costs associated with loan administration due to recent regulatory changes. This proposal does not provide any customer benefit but would eventually increase the cost of servicing loans which would add cost to the small commercial borrower.

It is possible we will be forced to shorten our maturity periods which will also have a negative impact on efficiencies that customers currently benefit from. Again, unnecessary cost passed on to the customer.

I am under the impression that FASB's intent was to provide consistent accounting globally and this proposal does not.

I request that this accounting proposal No.1810-100 be withdrawn.

Sincerely,

Tim Turbeville Executive Vice President & Chief Operations Officer