

"People You Can Bank On"

September 20, 2010

Mr. Russell Golden Technical Director Financial Accounting Standards Board 401 Merritt 7 F.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 Mr. Golden:

Please take into consideration my thoughts and opinions on specific provisions of the exposure draft, "Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities." I am the Chief Financial Officer of NBC Oklahoma, a banking institution located in several cities throughout Oklahoma with \$450,000,000 in total assets.

I am strongly opposed to the portion of the proposal that would require all of our financial instruments, especially loans, to be reported at market value on the balance sheet. The only time we sell any of our loans is when they would have put us over our legal lending limit. We feel that valuing our loan portfolio in accordance with this proposal would restrict our lending efforts, thus giving our customers less options in order to minimize the volatility it would create.

Since there is no readily determinable market for them and they are not held for capital appreciation, we feel that trying to create one makes no real sense. Even if we could easily obtain a market price, our loans are just one part of our total customer relationship and we would have no financial incentive to sell.

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To me, the way banks are currently reporting their financial information is more reliable and understandable than allowing them to have to come up with their own estimates and assumptions which could lead to manipulating the results. Everyone would be coming up with their own ideas and ways on how to mark to market, resulting in significant costs and resources to get us nothing more than irrelevant, unusable and confusing financial information.

Thanks for your consideration.

Sincerely,

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Senior Vice President Chief Financial Officer