From: vbogan@fbcbank.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: Thursday, September 23, 2010 10:58:04 AM

R. Van Bogan 105 E. Robinson Street Orlando, FL 32801-1655

September 23, 2010

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

Dear Mr. Golden:

Florida Bank of Commerce is a \$240 million community bank located in Orlando and Central Florida.

The bank's limited staff resources to implement the proposal would require additional staffing and expense as well as the proposed negative impact on bank capital and lending ability.

Sincerely,

R. Van Bogan 407-244-5959