From: <u>dnightingale@maple-bank.com</u>

To: <u>Director - FASB</u>

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 30, 2010 9:53:18 AM

David Nightingale 11660 Theatre Dr N Champlin, MN 55316-4507

September 30, 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 comment on FASB's Exposure Draft: Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities. I am writing to urge FASB to not go forward with the proposal. The primary business of community banks is to hold financial instruments to collect contractual cash flows, not to trade them on a regular basis.

Mr. Golden, this requirement, espeically for a small community bank like Maple represents a major time commitment to determine values based on for the most part educated guesses. This concept ignores that going concern concept as it essentially prices everything at fire sale values which is neither fair or reasonable.

Conservative community bankers see the need for 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, such as the current environment.

The proposed accounting changes will exacerbate cyclicality in financial results due to the greater reliance on fair value measurements, valuations that will be less accurate than current accounting requirements.

Sincerely,

David Nightingale 763-712-2834