From: Tim Hills [mailto:thills_hsb@aceks.com] **Sent:** Wednesday, October 16, 2013 5:15 PM

To: Director - FASB

Subject: new fasb proposal

To whom it may concern:

I would like to voice my strong opposition to the new rules you are proposing. The bank examiners (occ) at my previous place of employment could not explain the fasb rules the way they are now. Everything was so subjective – no starting place, no ending place. They basically told us to find a figure we were comfortable with and work backward. If examiners can't explain to us the way it is supposed to work how can we even hope to figure it out.

How in the world can you expect small banks to be able to work within the parameters you are proposing? Are you wanting to shut down the lending function in community banks all over the country?

This makes absolutely no sense. I would say "common" sense but that went out the window a loooooonnnnnnggggg time ago. We need policies to be easier to understand not more complex that just add an extra burden on community banks that does not make us a penny. This does not make any community bank more safe or sound – just more undue burden. All this does is hurt small businesses and consumers by increasing their interest expense.

I just have one question – has anyone that worked on this proposal worked in a community bank or any bank at all? If they have let them try to explain to all the community banks how this is going to "help" us.

Thank you for your time.

Sincerely,

Timothy A. Hills Sr. Vice President Bank of Sedan, Kansas – Branch of Howard State Bank