From: Joe Wachtel [mailto:joe@monitorbank.com] **Sent:** Wednesday, October 23, 2013 1:33 PM

To: Director - FASB

Subject: ALLL new calculations

In response to the proposed Accounting Standards Update on credit losses, unless your intentions are to close up the small community banks across America, I urge you to carve out an exemption for them. And by small community banks, I'm not talking assets in the billions – I'm speaking of banks like ours that are \$250 million and under. There is no way we can pay for these regulations in either dollars or staff – we just don't have either. And based on any systemic risk we pose to the system, we are but a drop in the ocean.

As such, I strongly urge you to exempt the true small community banks from this proposed rule.

Joe Wachtel President Monitor Bank Big Prairie, Ohio