

CASS COUNTY BANK

P.O. BOX 430
PLATTSMOUTH, NEBRASKA 68048
(402) 296-3333
MEMBER FDIC

Letter of Comment No: 221
File Reference: EITF03-1A

October 26, 2004

Mr. Lawrence Smith
Director and Chairman of the Emerging Issues Task Force
Financial Accounting Standards Board
401 Merrit 7
Norwalk, Connecticut 06856

Dear Mr. Smith:

The Cass County Bank of Plattsmouth, Nebraska appreciates the opportunity to comment on the proposed Staff Position, issued on September 15, 2004 by the Financial Accounting Standards Board (FSP 03-1-a). Cass County Bank has \$50 million in assets and serves the small community of Plattsmouth, Nebraska, population 7000, and the surrounding area.

I am deeply concerned about the proposed changes with regards to the EITF Issue 03-1-a, and am thankful that FASB delayed the effective date and allowed commentary from our industry.

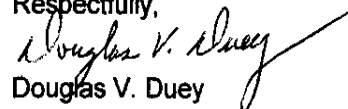
I believe that the proposed changes could have a dramatic negative effect on Cass County Bank, specifically with regards to our Asset/Liability Management. Debt securities held in AFS should not be written down for changes in market values that are due solely to increases in interest rates. Furthermore, requiring an "intent to hold" in AFS is inconsistent with AFS. I believe that the focus should be on "ability to hold". Cass County Bank was chartered in 1966 and it has been our practice, and will continue to be our practice, to purchase securities and to typically hold them until their maturity. Of course, we place the majority of our securities in AFS for provisional liquidity need. I believe that this is the general practice of well managed community banks.

As you know, our financial statements are available to the public and I have been impressed that our customers regularly compare the statements of Cass County Bank and other area banks. I believe that if the proposed staff position were adopted that the resultant potential changes in financial condition reported by banks may cause our customers and others to feel less secure about their bank deposits. It would seem that this is clearly not the time to plant an additional seed of uncertainty in the minds of already weary Americans. If implemented, the proposal could potentially cause economic disruption in the marketplace,

which would adversely affect all consumers. Additionally, it would seem to me that if implemented, bankers would be likely to make short-term investments, even if longer term investments were more appropriate. Please reconsider the potentially damaging consequences that will result with implementation of the proposal.

Once again, thank you for this opportunity to comment on this proposal and for considering my viewpoint.

Respectfully,

A handwritten signature in cursive script that reads "Douglas V. Duey". The signature is written in black ink and is positioned above the printed name.

Douglas V. Duey

President