



LETTER OF COMMENT NO.

----Original Message----

From: Clark III, Bayard [mailto:Bayard.ClarkIII@CommerceBank.com]

Sent: Wednesday, October 01, 2008 10:53 AM

To: Russell Golden; dfisher@ABA.com

Subject: Comment: Re--FAS 157

Dear Mr. Golden and Ms. Fisher:

I would like to endorse the views expressed by Jeff Aberdeen, Controller of Commerce Bancshares, regarding new interpretations to application of FAS 157. While there have been many contributors to current conditions in the financial markets, I believe that application of this rule, which has not seen the test of times such as these, has contributed materially to the uncertainty, rather than certainty, of asset valuations. As the financial markets depend on confidence among its participants, this confidence can not be had without certainty of underlying valuations of assets. Please help us bring that certainty to our markets by promulgating a clearly understandable accounting rule. Thank you for your attention to this most urgent matter.

A. Bayard Clark, EVP & CFO, Commerce Bancshares, Inc.