

"Serving Cass County Since 1868"

October 9, 2009

Mr. Russell Golden Technical Director Financial Accounting Standards Board 301 Merritt 7 P. O. Box 5116 Norwalk, CT 06856-5116

Via email: <u>director@fasb.org</u>

File Reference No. 1710-100 Fair Value Measurements and Disclosures (Topic 820) – Improving Disclosures about Fair Value Measurements

Dear Mr. Golden:

Allen Bank and Trust Company appreciates the opportunity to comment on the exposure drafts: Fair Value Measurements and Disclosures (Topic 820) – Improving Disclosures about Fair Value Measurements (ED). ABA brings together banks of all sizes and charters into one association. Allen Bank is a privately held corporation that operates in one state and has \$125 million in assets, of which \$30 million are on the balance sheet at fair value.

We currently use Country Club Bank services to prepare the existing fair value information, including disclosures, a parent company to analyze our portfolio and pay over \$8,000 for this service. We estimate that the additional information will cost \$1000 per quarter. Unfortunately this information is rarely discussed in our board meetings in detail. So we believe the benefits of presenting further fair value disclosures will be limited.

I agree with the recommendations within the ABA comment letter.

Thank you for your attention to these matters and for considering our views. Please feel free to contact me at 816-380-3214 if you would like to discuss my views.

Sincerely,

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President