

June 7, 2010

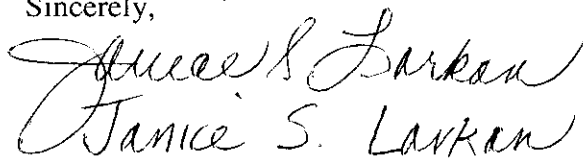
Technical Director  
File Reference No. 1810-100  
Financial Accounting Standards Board  
401 Merritt 7  
PO Box 5116  
Norwalk, CT 06856-5116

Technical Director:

I am writing in regards to the Exposure Draft issued May 26, 2010 entitled "Accounting for Financial Instruments and Revision to the Accounting for Derivative Instruments and Hedging Activities". I am an investor in a non-public community bank (assets less than \$500 million) located in Del Rio, Texas and am concerned about the mark-to-market provision in the Exposure Draft. When I look at the financial statements of the bank, I am interested in how much net worth has grown over the past year through real earnings not the net "fair value" of the bank's assets and liabilities. Mark to market adjustments opens up the financial statements to subjective assumptions that can be manipulated by management and then relied upon by us, the shareholders. The fair value or mark to market adjustments should be presented in a detailed footnote to the financial statements rather than on the face of the statements.

I have been an investor in the banking industry for many years and the theory of mark-to-market accounting does not apply itself to the banking business model. How do you put a market value on a 30-year mortgage or a deposit transaction account? I hope that the Board reconsiders its position on mark-to-market accounting and how it impacts an investor's true use of financial statements.

Sincerely,

  
Janice S. Larkan  
Del Rio, TX