



CHEVROLET • BUICK • GMC TRUCKS

July 22, 2010

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

Dear Mr. Golden;

I appreciate the opportunity to comment on the exposure draft “*Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities*” (“proposal”). As a bank investor I would like to express my concern about the portion of the proposal that requires all financial instruments to be marked to market. From a bank investor’s view point, this will lessen transparency rather than improve it and put bank capital at risk.

Additionally, I am concerned about the cost of additional staff and consultants to assist with estimated values. This will also produce significantly higher audit fees, for something bank investors like myself will never use.

With this in mind, I strongly recommend you drop your proposal to mark loans to market. As an investor it does not improve financial reporting.

Sincerely,


Jerry Stevens