



August 24, 2010

Mr. Russell Golden
Technical Director
Financial Accounting Standards Board
401 Merritt 7, P.O. Box 5116
Norwalk, CT 06856-5116
File Reference No. 1810-100

Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities

Dear Mr. Golden,

Thank you for giving us the opportunity to comment on the above exposure draft. We are a 120 year old, 5th generation, family-owned, privately held community bank. We have a small number of shareholders, most of which have inherited their shares and have passed them down from generation to generation. Because we are regulated by the FDIC we are required to have an independent audit of our financial statements each year. Even in the few years I have been the CFO for Central Bank I have watched each year as the number of disclosures and footnotes and accounting changes have not only increase dramatically the thickness of our annual report but also the financial burden on the bank has increased dramatically as well with very little benefit to the bank or our shareholders.

Many of these changes over the past years have come about in an attempt to provide greater "transparency and disclosure" to the investors of publicly traded companies. The current proposal appears to be no different. As I have contemplated the proposed impact on our audit and financial statements once again by the current "Mark to Market" provision within the current proposal, I have a few concerns that I would like to express.

The first concern is the relevancy of this proposal to closely held, non-publicly traded community banks. It seems that closely held companies are always getting caught up in rules and regulations that are generally directed and meant for the publicly traded company. This appears to be no exception.

Provo – Riverside
1300 N State 375-5963
Springville
202 S Main 489-9466
American Fork
175 E Main 756-9900
Merchant & Bankcard Services
75 N University Ave 375-1000

Spanish Fork
1 N Main 798-7481
Orem
415 N State 224-1420
Mapleton
385 N Main 489-5640
Mortgage Loans
95 N University Ave 373-3336

Lehi
475 E Main 766-3886
Payson
182 N Main 465-9276
Pleasant Grove
801 E Pleasant Grove Blvd 785-9844
Provo – Downtown
75 N University Ave 375-1000

The second concern is that if we were required to mark all of our financial instruments to market that it would greatly increase the volatility of our financial statements. We already disclose fair market value of our financial instruments in our footnotes in accordance with SFAS 107, 157 and 159. To make them now an ongoing part of our financial statements rather than just part of our disclosures would create greater volatility, greater expense, more work, and greater confusion with absolutely no benefit to our shareholders, our regulators or our management. The only impact that I see it having is that it would drive us to shorten our loan and our deposit maturities in order to minimize the volatility that would now occur on our balance sheet and income statement which would ultimately lead to a disservice to our customers and clients.

At a minimum, I would ask that as you consider this proposal that you consider exempting closely held community banks from this requirement as it has absolutely no benefit to our shareholders and serves absolutely no purpose other than to ultimately make it more difficult to serve our community.

Thank you again for giving us the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in cursive script that reads "Alan Blackham".

Alan Blackham
Executive V.P. & CFO
Central Bank
Provo, Utah