September 7, 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 the opportunity to comment on the exposure draft Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities ("proposal"). I am a bank investor and I own shares in several different banks. I regularly review the financial information for my portfolio of bank stocks, and transparent financial reporting is an important element in order for me to make investment decisions. I am opposed to the portion of the proposal that requires all financial instruments to be marked to market because it will cloud transparency rather than improve it

Some of the shares of stock I own are in community banks. I have invested in these types of institutions, because I believe in their importance to our economy. Community banks provide small local businesses the funding that is not available from larger institutions. Small businesses provide jobs, which are sorely needed in this Country. Community banks have been hit hard over the last few years, and I believe that this proposal would be hitting these institutions another blow.

Therefore, I am very concerned about the costs and resources that will need to be dedicated to produce and audit such data. We have learned from the recent financial crisis that markets are sometimes illiquid and sometimes irrational. Because banks do not use fair values in managing their cash flows, I anticipate that this could require banks to hire more staff and/or consultants to assist with estimating fair values and to pay significantly higher audit fees. In the end, investors will be paying consultants and auditors significant sums to make estimates that my fellow shareholders and I will do nothing with. I would prefer to continue to invest in Community Banks, not law firms.

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

Thank you for considering my views. Please feel free to contact me if you would like to discuss my concerns.

Sincerely,

Margaret Coutchie, MBA, CPA AVP/Controller Grand River Bank