

The markets have also proven vulnerable to unexpected events which have skewed results or frozen and shut down markets which ultimately resulted in investors being unable to determine what fair value really is.

The proposal also assumes a consistent application of an accounting approach by everyone to whom the proposal applies to. The current conditions, at best, will make it very difficult to achieve any kind of consistency.

In addition, it would appear that the proposal will require significant additional resources on the bank's part to implement and ultimately maintain. Each bank loan can be unique which can require time and attention to determine what that particular loan's market value is. The bigger the loan portfolio, the more time it will take to arrive at fair value. The proposal also increases the complexity of the process to arrive at a loan's value which will increase the likelihood of errors occurring which can ultimately lead to material misstatements in the financial statements. That does not strike me as an improvement to the accounting practices from an investor perspective.

Finally, I do not believe from an investor perspective, that bank shareholders focus primarily on the fair value of a loan. Investor focus is on how a bank performs. Investors look at whether a bank has adequate deposit balances, a performing loan portfolio and adequate levels of capital. The mark to market proposal does not clarify a bank's performance but can further obscure a bank's performance by putting the focus on the market value of assets that the bank has no intention of marketing.

Thank you for considering my comments. Please feel welcome to contact me at 92.253.1820 if you would like to discuss my concerns.

Sincerely,



Bradley K. Meier
President; CEO
and Shareholder