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

RE: File Reference No 1810-100 "Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities"

Dear Mr. Golden:

I appreciate the opportunity to comment on the exposure draft hereby referenced above. I am a bank investor and I regularly review the financial information for these stocks. It is critical that I know but more importantly that I understand a bank's financial position. Transparent financial reporting is very important to me when making wise investment decisions. I strongly opposed the proposal that requires all financial instruments to be marked to market.

As an investor, I am interested in how loans perform, not the market value. Most loans are made to be retained and if so should not be treated as securities, which can be sold. There is a difference between the two. The focus on mark to market is not relevant for loans that are not being sold. In the proposal, banks would record loans, deposits, off-balance sheet commitments and core deposit premiums at fair value. I believe this proposed accounting approach is flawed and a major mistake. It should remain as a footnote which is currently used. As a footnote, it provides information without the confusion and misunderstanding that would result from incorporating this into the reported financial statements.

Additionally, most banks do not possess the knowledge base or the internal resources to appropriately estimate fair vales. As a result, they will be burdened by additional cost to comply with this exposure draft and it is very questionable whether the increased costs will add any value to the quality of the financial statements, especially when comparing the results of one banking entity to another.

In closing, I strongly ask you to consider my concern and drop this proposal to mark all financial instruments to market. I believe, as an investor, this will only weaken not improve transparency in financial reporting.

Thank you for taking my opinion into consideration. Please do not further harm our financial system by issuing this proposal.

Sincerely,

Kade L. Matthews