From:
 Hutchens, Kim T

 To:
 Director - FASB

 Subject:
 Please review

Date: Monday, September 13, 2010 4:09:02 PM

September 13, 2010

Technical Director
Financial Accounting Standards Board
401 Merritt 7, PO Box 5116
Norwalk, CT 06856-5116
File Reference No. 1818-100

Sir:

Having spent my career between the political arena/Capitol Hill and the community bank arena, I am not sure I understand the position taken by the FASB Board. I am sure, however, that your current application of the mark to market approach will be disastrous for community banks and savings institutions.

In short I believe the mark to market concept applied to commercial loans would add unnecessary volatility to the financial reporting of commercial banks. By and large commercial loans are not made to be sold and with few exceptions there is no market for these complex financial arrangements. This proposal would have a very negative effect on the way banks make commercial loan decisions and greatly reduce the availability of credit in our economy.

Please reconsider this proposal in light of the negative effect it would have on our economy and the critical component community banks play in the everyday lives of millions of citizens.

Best regards,
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