



September 7, 2010

Technical Director
File reference 1810-100
Financial Accounting Standards Board
401 Merritt 7, P.O. Box 5116
Norwalk, CT 06856-5116

Dear Technical Director:

As a regular user of financial statements of privately held businesses and as a supporter of economic development, I strongly disagree with the proposed changes to the "Mark to market rules" that will apply to the loan portfolios of financial institutions.

If a bank has every intention as well as the ability to hold loans to maturity, current accounting regulations produce much more accuracy in financial statements than the proposed requirement to use a hypothetical value "as if the loan would be sold in the open market". This is particularly true for loans made to small and medium sized businesses, for which there is no active or orderly market.

Our banks have very serious concerns about the unintended consequences of this proposed change and believe it will lead to less credit availability, higher interest rates and potentially even contribute to another financial crisis similar to 2008. Loan demand is not very robust at this time; we do not need to add any more restrictions that will affect economic development.

I strongly urge you to reconsider this proposed change. Banks do not need your help. You are only adding to our costs.

Your proposal will distort the meaning of financial statements rather than improve clarity.

Sincerely,

A handwritten signature in black ink, appearing to read 'John T. Stewart III', written over a horizontal line.

John T. Stewart III

JTS:vl