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September 13, 2010

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*

I am writing to let you know that I am opposed to this "Mark to Market" proposal for banks because I believe it will have a negative impact on the industry. I don't believe this will improve transparency and in the end will make it difficult to access the true capital of a bank. Under our current credit culture, our bancsystem sells very few loans and in the end, and due to the size of our markets, I don't feel there are reliable markets that we could sell to. As a result, fair value is not an appropriate measurement for our loans. I believe this proposal would lead to changes in our and other bank's business models that would not be good for the borrowers in our communities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tiffani Coleman', with a long horizontal line extending to the right.

Tiffani Coleman  
First Interstate Bank, Credit Department  
[Tiffani.coleman@fib.com](mailto:Tiffani.coleman@fib.com)