

James L. Eaton, Jr.
800 Bonhomme Creek Court
Bonne Terre, MO 63628

September 8, 2010

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

Re: Accounting for Financial Instruments and Revisions to the Accounting
for Derivative Instruments and Hedging Activities

Dear Mr. Golden:

I appreciate the opportunity provided to comment on the proposed "Accounting For Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities". I am an investor in bank stock and serve on a community bank board of directors. I am opposed to the section of the proposal to require our bank to mark to market all financial instruments in the bank's asset portfolios.

The section of the bank's assets that are of the most interest to me is the loan portfolio. The performance of the bank's loans has a greater interest to me than what the assumed market value of the loans would indicate. I do not believe a reliable value can be assessed to each loan within the portfolio, taking into consideration the many variances in the loan terms, rates and collateralization.

In a community bank environment I fail to understand what the perceived fair value of the loan portfolio will accomplish. By establishing a fair value does that truly represent the amount of funding the bank would receive if the loans were to be sold? The performance of the portfolio should be and does represent a stronger basis for value.

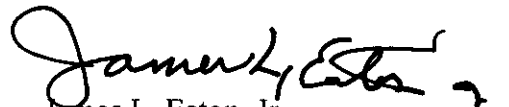
At this time, it is unfathomable to determine how much of our bank's personnel resources will have to be involved in establishing and maintaining a valuation of the loan portfolio, such as proposed. Additionally, the costs for a bank of our size could be extremely prohibitive.

As exhibited recently in the financial crisis, valuations can fluctuate irrationally and those assumed loan valuations could impact our bank's capital structure in an extremely negative manner for no apparent benefit.

I ask, for the above reasons, that this proposal to mark loans to market be dropped from consideration by the Financial Accounting Standards Board.

I thank you for your time and this opportunity to present my views.

Sincerely,



James L. Eaton, Jr.