

1810-100 Comment Letter No. 641

September 13, 2010

Technical Director Financial Accounting Standards Board 401 Merritt7, PO Box 5116 Norwalk, CT 06856-5116

File Reference Number 1810-100

Dear Sir or Madam:

I am a CFO for a community bank in Jacksonville, Arkansas. I am also a CPA. To say I am gravely concerned about a proposal to extend mark-to-market accounting to virtually the entire balance sheet of our bank is a gross understatement.

While in theory, such a proposal would have merit. In practice, however, such a proposal will create untold hours of work for me and my staff. In addition, the work required by our independent CPA's will grow materially as will our costs. And, after all of this time and money, the end result will be information that will have little relationship to reality and will only create skepticism on the part of our stockholders and the users of our financial statements.

Our stockholders, and the stockholders of every other commercial bank in America, expect to receive financial information that is straightforward and accurate. Information that is transparent and relevant. To begin providing financial information that is based on multiple personal biases and speculation and will serve no beneficial purpose and only confuse the audience that such a proposal is apparently intended to serve.

Such a proposal, while well-intended, will no doubt have unintended consequences. One such major consequence will be a negative effect on lending. Loan underwriting criteria will no doubt be tightened. At a time when our economy is struggling, the last thing we need are further constraints on lending when loan demand is already weak.

If the intent of such a proposal is to help the investors of the large, mega-banks determine the "real value" of their investment, you should make the mark-to-market proposal apply only to the large banks and determine if such a proposal generates the intended results. I think it is safe to say that there has been no "cry for help" from the investors of the community banks across America for such information. It appears that we are working hard to find a problem for which we already have a solution.



Please, please realize the burden that you will be placing on thousands of banks to extend out the some type of model with which we can generate a very subjective report that will be acceptable to you and our regulators but only confuse our shareholders and the users of financial statements. There will be no winners if this proposal in put in place.

Thank you for your consideration.

Sincerely,

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Kim Crook

Senior Vice President and Chief Financial Officer