

James C. Riley  
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September 20, 2010

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

Re: File Reference No. 1810-100

Dear Sir/Madam:

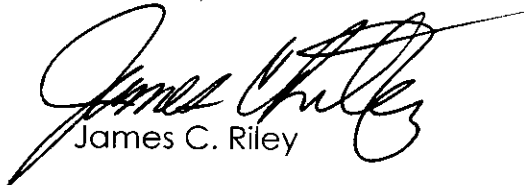
As an investor and manager of Hometown National Bank and an investor in other financial institutions, I oppose mark to market accounting for financial instruments because it is not reflective of the business of community banking. Our bank primarily holds loans, investments and liabilities for cash-flow earnings and not for trading. Fair value accounting would complicate financial statement presentation and make it more difficult for the average investor to understand.

Models will need to be built to value financial instruments at a great cost because there is no liquid and available market for most of the assets and liabilities of a community bank. These models could differ in logic and scope, creating a lack of comparability between financial institutions.

Fair value accounting for financial instruments may also lead to significant fluctuations in capital due to booking unrealized gains and losses, and may make it onerous to manage to certain capital levels.

Please do not implement mark to market as proposed.

Sincerely,



James C. Riley

JCR:jb