

Mr. Russell Golden, Technical Director

Financial Accounting Standards Board

401 Merritt 7

P.O. Box 5116

Norwalk, CT. 06856-5116

RE: File reference # 1810-100

Dear Mr. Golden,

I am writing this letter to express my opposition to the Fair Value proposal. County Bank is a small community bank located in Sussex County, Delaware. We are a \$393mm bank and have nine branches spread throughout the largely suburban/rural county. As you would imagine of a bank our size, our financial statements are fairly unsophisticated. Our primary assets are commercial loans, limited residential loans, agricultural loans and few personal loans that are intended to be held to maturity. Our primary liability is comprised of our local customers' deposits. Our loans and deposits are not readily marketable. We don't actively trade our loans or deposits and it would be very difficult and, due to limited resources, burdensome to mark them to a limited market. If we have to value our balance sheet to what is a very limited market, the values will not have a high degree of reliability. Additionally, because markets move continually, there may be large cyclical swings reflected in the financial statement that don't accurately reflect the value of the loan or deposit and is less accurate than the current accounting rules.

Please consider the smaller community banks as you deliberate on the Fair Value Proposal. Nationwide, there is pressure on banks' financial statements due to the economy. Additional pressure created by portions of this proposal would be costly to implement, would not foster investor confidence, and would not reflect the accurate values of investments that are intended to be held to maturity.

Thank you for your consideration.

Sincerely,

Harold L. Slatcher

President and CEO