1810-100 Comment Letter No. 1266

## FIRST SECURITY BANK

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

September 21, 2010

Reference No: 1810-100

Dear Sirs:

Thank you for giving me the opportunity to comment on "Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities." I strongly oppose the provision that would require all financial instruments be marked to market.

Being a community bank most of our loans are made to local customers. A very small percentage of residential real estate loans are sold into the secondary market. Most loans are made to keep on our booked. If problems arrive we do out best work with the customer and only as a last resort do we liquidate collateral. The process of marking our loans to market won't serve any constructive purpose because investors won't be looking at those loans. Finally, there is no market to assist our bank in determining a fair value for all our local loans. Building a market with outside consultants would add unnecessary cost.

Please drop the fair value section of the proposed regulation.

Sincerely,

Mark T. Kettelkamp, President First Security Bank-Evansville PO Box 100, 303 Kron Street

Evansville, MN 56326

