## 1ST SUMMIT BANK

ELMER C. LASLO

PRESIDENT AND CHIEF EXECUTIVE OFFICER

September 21, 2010



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

RE: File Reference: No. 1810-100

Dear Mr. Golden:

Thank you for the opportunity to comment on the exposure draft Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities ("proposal").

As a bank investor, it is important for me to receive financial information that is meaningful and accurate.

In your proposal, banks must record loans on their balance sheets at their market value. In reviewing financial results and discussing bank performance with executives of other banks, the market value of loans are never discussed. Loan performance, such as asset quality, delinquencies, and yields are what drives the value of a bank stock. If a bank has solid loan performance, loans are repaid and investors can see solid returns.

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CRESSON

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GREENSBURG WAL®MART If bank capital is subjected to wide swings due to mark-to-market loan values, this volatility will play havoc with stock prices. That would be an undesired result.

I hope you will drop your proposal to mark loans to market.

Thank you for your consideration of this critical issue. Please contact me if you would like to discuss this further.

Sincerely,

ECL:lkw

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