

September 23, 2010

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

File Reference: No. 1810-100 Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities

Dear Members of the Financial Accounting Standards Board:

I am an Executive Vice-President of First Financial Bank in Abilene, Texas. I have been in banking for 40 years, and I am very concerned about the negative impact on our bank and industry if mark to market accounting is applied to our loan portfolio.

We hold our commercial loans and do not sell them. There is no secondary market for these loans making a fair value determination extremely difficult, especially given the many factors that surround a typical commercial loan issued by a community bank.

If enacted, the cost of complying with the new accounting standards will significantly increase. In my eyes, the extra cost will provide no benefit to our bank. This will also push banks to a more short-term lending process, which will contract available credit to businesses and that will ultimately hurt our already soft economy.

This proposal will confuse bank investors, decrease bank earnings, and certainly will not be an improvement over the current accounting standards. Please withdraw this proposal!

Sincerely,

Charles T. Boecking

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