From: Darrell Raum [mailto:draum@BruningBank.com] **Sent:** Wednesday, September 29, 2010 8:49 AM

To: Russell Golden

Subject: FASB and "Fair Market" Value

I am the senior lender in a \$200,000,000 bank in rural Nebraska. I do not understand how we make a rule originally intended stop big banks from taking credit card receivables off their balance sheet balance, to creating a ridicules rules that hinders banks from participating commercial loans with one another. Then through in that we have to use fair market value into the mix. Since small commercial and ag loans are not sold or traded I would like someone to explain to me how we are to come up with what is "fair market". The FSBE 166 and fair market value rule is going to hurt small business in rural America cost banks money and do nothing to protect any bank or customer from anything. This is one more way for the accounting industry to self perpetuate business for the fellow accountants and does nothing but hurt the free enterprise system.