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

I. Fair Value

Mark to Market

This rule destroys the very purpose of a financial intermediary by assigning a market value to an unmarketable asset. Banks use deposits to make illiquid loans. Imposing an artificial accounting rule on these basic financial transactions will destroy commercial banking and create a whole new credit crisis. The focus on mark-to-market accounting has little if any revelance for loans that are not being sold.

II. Loan Impairment

All of our farm, business, and consumer loans are made to hold in our portfolio. To establish a market value for an unmarkable asset is guesswork. Attempts by our independent community bank to structure a loan for a supposedly third party purchaser or appraiser would simply impair our abililty to function efficiently and we would commit to a great deal of time and effort without a productive result.

I strongly urge the FASB to reject the proposal to record all financial assets (including loans) and liabilities at fair value on the balance sheet.

Thank you.

Yours truly, Darlys Gulme

Darlys Hulme President

Total bank assets-\$150 million