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

Via email: [director@fasb.org](mailto:director@fasb.org)

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


Dear Mr. Golden:

As an investor in a financial institution, I am writing in strong opposition to your proposal to force mark-to-market accounting on virtually the entire bank's balance sheet, including loans. I disagree that this change in accounting method will help investors better understand financial statements of financial institutions.

There is no realistic way to mark-to-market loans held to maturity other than amortized cost. If imposed, mark-to-market accounting would not accurately reflect the value of the bank and would create volatility in bank earnings and capital.

I am concerned with the added resources required by banks to monitor and manage the valuation and audit requirements of the proposed accounting method without realizing any benefit.

Please do not let history repeat itself by creating another financial crisis due to the expansion of mark-to-market accounting.

Yours truly  
  
Mark Prater  
Investor