

Member FDIC

September 21, 2010

Mr. Russell Golden 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 Mr. Golden:

We are writing to express our strong opposition to the current proposal to apply fair value accounting ("mark-to-market") to most financial instruments (including loans) on a bank's balance sheet. We are officers and/or directors as well as investors in Progressive Bank, a community bank with operations spanning northern Louisiana. Our business model at Progressive Bank is designed to generate earnings from accepting deposits, making loans and holding those loans to maturity. In other words, we are in the business of long-term investing rather than active trading. In light of this model, it makes little sense to apply short-term valuations to an illiquid loan portfolio held for the long-term. The mark-to-market proposal is based on the premise that investors would benefit from short-term valuation information. On the contrary, we believe our shareholders are long-term investors.

As a community bank, this practice would add an element of complexity to banking that would be both impractical and nearly impossible to administer due to the diverse nature of the assets we hold within our loan portfolio. Periodically marking these assets to market would create enormous implementation and ongoing audit costs, while producing useless and confusing information.

We respectfully request that FASB withdraw the current fair value accounting ("mark-to-market") proposal. Thank you for your consideration in this matter.

Sincerely,

George W. Cumrhings, III

President, CEO & Chairman of the Board

R. Stewart Ewing, Jr., CPA Director & Chairman of the Audit Committee

Director & Chief Credit Officer

David M. Hampton

EVP & Chief Operating Officer

Hal H. Hinchliffe

EVP & Head of Real Estate Lending

Michele Thaxton, CPA

SVP & Chief Financial Officer