## HAYDEN & CUNNINGHAM, PLLC Attorneys At Law

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September 29, 2010

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

Re: 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 writing regarding the above proposal. As a director of a small community bank, and as legal counsel for several small community banks, I would like to express my opposition to the proposed changes.

This type of accounting change will impose, as other regulations have, an unnecessary expense and burden on not only our bank but on all community banks. We do not sell our loans on the secondary market because they hold no real value. These loans are made to our customers within our community and we plan to continue to serve our customers and their loans. We are a small community bank of less than \$60 million in total assets

In closing I would like FASB to reconsider implementing the fair value accounting method because of the reasons stated above.

Please withdraw your proposal.

Your consideration of this request would be greatly appreciated.

Sincerely,

Hayden & Cunningham, PLLC

7750 Broadway

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