



1810-100  
Comment Letter No. 1847  
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**Peggy L. Hudson**  
Senior Vice President

September 20, 2010

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

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

To Whom It May Concern:

I am writing on behalf of American Trust & Savings and about the proposed standards update referenced above. My bank understands that contained in the proposed changes is a rule that would make bank loans subject to "market" valuations.

We assume you are aware that nearly all bank loan accounts are made with no intention of creating a market for the sale of that loan. Exactly the opposite is true. Loans made within community banks, in general, are to assist borrowers' requirements for capital, growth, inventories, community needs, personnel needs, and numerous other purposes. This is the primary purpose of lending.

To attempt to create "market" value for such assets would be detrimental and have a profoundly negative impact on our business, our industry, and our economy.

I respectfully urge you to eliminate this rule to preserve the core function and purpose of lending.

Sincerely,