From: David M. Hubbard
To: Director - FASB
Subject: File Reference: No. 1810-100 Accounting for Financial Instruments and Revisions to th Accounting for Derivative Instrumnets and Hedging Activities
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As a person who is an investor in a small community bank, I am strongly opposed to the implementation of this rule referenced above. A forced change to this type of accounting adds a lot of volatility to the balance sheet of a bank, as well as the expense to the financial institution to secure the personnel that it would take to impliment the change. Small banks have always and need to continue to monitor the borrowers repayment performance. In most cases marking to market is irrelevant, since the loans are not sold.

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