

Sept 23, 2010

Mr. Russell Holden

Technical Director

FASB

P.O Box 5116

New Haven, CT - 06856-5116

File Reference No. 1810-100

Dear Mr. Holden:

The proposed Mark to Market rules for all Banks is unfair. It is not relevant to the Commercial banking business model. It will require significant cost to banks with little benefit to users. This rule should not apply to small banks where it introduces complexity where complexity is neither needed nor desired. Full fair value accounting will add unnecessary practicality to the financial system. Please Stop this rule!

Sincerely,



Christopher W. Martin  
Chief Operating Officer  
HS Bank, SunTrust, NC.