

From: cplaster@bankbcm.com
To: [Director - FASB](#)
Subject: Comments on No. 1810-100, "Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities" Exposure Draft
Date: Thursday, September 23, 2010 12:13:05 PM

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September 23, 2010

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

Dear Mr. Golden:

Thank you for the opportunity to comment on FASB's Exposure Draft: Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities.

We are opposed to this draft and urge FASB to not go forward with the proposal.

We are a strongly capitalized \$80m private closely held community bank located in Moberly, Randolph County, Missouri. Our primary business is to solicit local deposits and then reinvest them in the form of local ag, business, consumer, home mortgages, and Missouri municipal securities. We hold these loans and investments to collect the contractual cash flows, not to trade them on a regular basis. We do not sell loans off our balance sheet and have never sold a security for liquidity purposes. There would be little if any active market to be able to "fair value" the types of loans we make.

The proposed accounting treatment for core deposits and loans would not provide any useful information to me or my family who own 100% of the bank. It would only serve to increase the already significant cost of our annual consolidated financial statement audit.

Again, we thank you for the opportunity to comment on this proposal.

Sincerely,

Craig H. Plaster, CFO
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