

From: Ron Mullins [<mailto:rmullins@ffinbank.com>]
Sent: Monday, September 27, 2010 11:15 AM
To: Russell Golden
Cc: eric@texasbankers.com
Subject: File Reference: No. 1810-100 Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities

Dear Mr. Golden:

As Chairman, President & CEO of First Financial Bank, N.A. in Stephenville, Texas, a \$335 million community bank, I am writing to express concern and opposition with the proposed changes as it relates to the requirement of all financial instruments to be marked to market. As a 32 year veteran banker that is proud to serve my community, the changes proposed in No. 1810-100 would only complicate our lending efforts and inhibit the ability to serve our customers through the increased costs of accounting for loans.

In August, our Bank was honored by the Small Business Administration as the **Number ONE producer** of the SBA's ARC loan product in the Dallas/Fort Worth Region. Our bank originated 59 of this Region's 124 ARC loans. ARC loans (American Recovery Capital) are limited to a maximum loan amount of \$35,000 each to small businesses and have a loan term of 79 months. Without this product available through the SBA, our Bank would not have been able to accommodate 59 small businesses with much needed capital. I cannot imagine the accounting that would be necessary to track these small loans as proposed by No. 1810-100. In fact, if No. 1810-100 had been reality, I would not have pursued this type of lending. The expense and cost burden of accounting for these small loans as proposed in No. 1800-100 would have made this much needed loan product unprofitable for my bank.

I respectfully request that FASB withdraw this proposal. Thank you for your time and careful consideration.

Sincerely,

Ron N. Mullins, Chairman, President & CEO
First Financial Bank, N.A.- Stephenville, Texas
P.O. Box 998
Stephenville, Texas 76401