From:
 wsbk@nntc.net

 To:
 Director - FASB

Subject: File Reference: No. 1810-100, "Accounting for Financial Instruments and Revisions to the Accounting for

Derivative Instruments and Hedging Activities"

Date: Wednesday, September 29, 2010 12:48:20 PM

Scott Watters PO Box 293 Winside, NE 68790-0293

September 29, 2010

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

Dear Mr. Golden:

Regarding the "Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activies", I am the Vice President of the Winside State Bank with total assets of \$20,000,000, and I am writing you concerning the Mark-to-Market reporting of all loans. Our institution is opposed to this requirement of all loans being listing as mark-to-market for the following reasons: First of all, our bank does borrower's ability to repay a loan, we would work through the collection process with the borrower rather than sell the loan. Secondly, our institution is not publicly traded, so this would not be of value to us. Thirdly, marking all loans to market would cause our bank's capital to sway with fluctuations in the markets, even if the entire loan portfolio is performing. Instead of providing better information about our bank's health, this knee-jerk reaction would mask it. Even if the banking regulators' Tier 1 capital doesn't include fair value fluctuations, we would still have to explain it to our customers and depositors. Lastly, the costs and resources that would been needed to comply with this new requirement would be significant with additional costs being paid to outside parties, such as auditors, to perform this market estimation. For these reasons, our bank requests that the mark-to-market loan valuation be removed.

Sincerely,

Vice President Winside State Bank