

From: rwilson@savingsbankofwapole.com
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: Thursday, September 30, 2010 3:08:21 PM

Richard Wilson
68 Ames Plaza Lane
Walpole, NH 03608-4404

September 30, 2010

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

Dear Mr. Golden:

Thank you for the opportunity to comment on the exposure draft, "Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities."

As the CFO of Savings Bank of Walpole, a mutual savings banking in Walpole New Hampshire with \$290 million in total assets, I am writing to express strong opposition to the exposure draft.

I am strongly opposed to the proposal that requires all financial instruments to be reported at fair values on the balance sheet. This is totally inconsistent with our business model. We do not sell loans that we book under any circumstances. So the fair value is irrelevant except in liquidation, which is what this proposal seems to assume. Liquidation accounting for going concerns appears in violation of common sense.

Estimating values for loans written by our institution that have never been and never will be sold would only corrupt the balance sheet with untestable and meaningless assumptions. The cost and resources to comply would be high for a result of less than no value.

I support the Board's efforts to implement a better methodology to estimate loan loss provisions. However, I have serious concerns that over the years in this as with so many issues you have failed to consider what mere mortals can understand and reasonably implement. Obtuse and impenetrable accounting rules cannot and do not make transparent easily understood financial statements. Please work with bank regulators and bankers on this issue so something comprehensible and useful results.

Accounting rules should be short, simple, and elegant. They should be grounded in a comprehensive and consistent view of reality and recognize the limitations of human beings that must work with them. They should be a support to the creation of economic value, not a hindrance, and certainly not destructive of it. Do consider how you might improve the lot of suffering humanity as you go about rule making and at least do as little harm as possible with the unjustifiable, unconscionable, undemocratic, and monopolistic power you have over the economic well-being

of a great part of humanity.

Thank you for considering my comments.

Sincerely,

603-355-4704
CFO & SVP
Savings Bank of Walpole