Mr. Russell O. Golden, Chairman  
Financial Accounting Standards Board  
401 Merritt-7  
Norwalk, Connecticut 06856-5116  

November 18, 2013

Mr. Golden:

I am the CEO of Pineland State Bank in Metter, Georgia. We are a small community bank in southern Georgia that has reservations concerning the proposed amendments by the FASB.

We serve a community of 5,000 in a county less than 11,000 in population. We take pride in the long standing relationships that we have established over the years with our customers and must continually fine tune our services to meet their needs within limits mandated by various state and federal agencies.

The vast majority of our loans are simple in nature and the more complex technique of upfront provisions based on future expected credit losses is excessive. While the regulations may need “tweaking” now and then we suggest that the committee consider adopting the latest proposal presented by ICBA. Their proposal would allow banks to consider impairments to loans and securities as they are recognized, possibly resulting in the funding of our reserve account sooner as shortfalls arise. Surely this process would be a more valuable tool in accessing the quality of our loan portfolio.

I appreciate the opportunity to present our bank’s side of this issue and respectfully ask that this proposal be tabled until a more efficient model for all community banks can be formalized.

Respectfully,

[Signature]

Richard S. Williams, CEO