From: Janet Kleen [jkleen@mindenexchange.com]
Sent: Wednesday, October 27, 2004 11:02 AM
To: Director - FASB
Subject: Proposed FASB,EIFT Issue 03-1

Letter of Comment No: 66
File Reference: EITF03-1A

Mr. Lawrence Smith
Director and Chairman/Emerging Issues Task Force
Financial Accounting Standards Board
401 Merritt 7
Norwalk, Connecticut 06856

Re: Proposed FASB, EITF Issue 03-1

Dear Mr. Smith,

The Minden Exchange Bank & Trust Co, Minden, Nebraska, is appreciative of the opportunity to comment on the proposed staff position issued on 9-15-05 by the FASB. Minden Exchange Bank thanks FASB for allowing extra time for comment on this issue, which could have confusing and damaging long-term consequences on all financial institutions.

Minden Exchange Bank & Trust Co. is a $130 million institution in south central Nebraska. In accordance with all other FASB requirements, we make a monthly evaluation (through our portfolio accounting purveyor) and recognize securities gains or losses on our daily balance sheet. It is my contention that debt securities held in AFS should not be written down for changes in market values that are due solely to increases in interest rates, and, at the same time requiring an "intent to hold" seems to be in direct conflict with the original concept of AFS, wherein the central focus should be on "ability to hold".

I respectfully suggest that the FASB categorizations now in place seem to be serving all purposes necessary for ongoing, accurate daily statement reporting, as well as quarterly and annual accurate accounting.

Thank you for your favorable consideration.

Sincerely,

Ray Van Norman
Chairman & CEO