



February 25, 2009

Technical Director Financial Accounting Standards Board 301 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116



LETTER OF COMMENT NO. 10

Via email: director@fasb.org

File Reference: Proposed FSP FAS 107-b and APB 28-a (Interim Disclosure about Fair Value of Financial Instruments)

Dear Technical Director:

American River Bank appreciates the opportunity to comment on the Proposed FSP FAS 107-b and APB 28-a (*Interim Disclosure about Fair Value of Financial Instruments*). American River Bank is a twenty-five year old community bank that serves the needs of businesses and professionals in Northern California.

We do not support the FASB's Proposed FASB FSP FAS 107-b and APB 28-a and we urge you to reject the proposal until more discussion takes place regarding the costs of providing this information including the time required to prepare the information. We believe, from a cost/benefit perspective, the costs of providing this vast amount of information on a quarterly basis greatly exceeds the value that is derived by such disclosures for our banking institution and our financial statement users.

Each year-end, we utilize numerous hours of our internal staff as well as consultation with our software in complying with the current disclosure requirements of SFAS 107. However, per our investor and client relations departments, we never receive inquiries, questions or follow-ups to this disclosure in our annual reports. With this in mind, we believe there will be little incremental benefit derived from such information provided on a quarterly basis.

Thank you for your attention to these matters and for considering our views.

Sincerely,

Mitchell A. Derenzo Executive Vice President Chief Financial Officer Erik A. Lawson Vice President Controller