



LETTER OF COMMENT NO. 11

February 25, 2009

Technical Director
Financial Accounting Standards Board
301 Merritt 7
POB 5116
Norwalk, CT 06856

RE: Proposed FSP FAS 107-b and APB28-a (Interim Disclosure about Fair Value of Financial Instruments)

Via e-mail

Dear Technical Director:

Franklin Bank appreciates the opportunity to provide comment on the Proposed FSP FAS 107-b and APB28-a (Interim Disclosure about Fair Value of Financial Instruments). Franklin Bank is a community bank that has assets of less than \$270 million. The bank serves the counties that we have branches in by mainly providing consumer, mortgage and small business financial services.

We do not support the proposal until more discussion would take place relating to the costs of providing this information including the time it would take to prepare the information. We believe the cost would far outweigh the benefit of providing this information to users of our financial information.

Each year the bank already spends notable resources providing financial information including current required disclosures. We receive few inquiries from our depositors or others concerning this information. We believe there would be little or no incremental benefit from providing these disclosures on a more frequent basis.

Thank you for your attention to these matters.

Sincerely

Frederick C. Scogno
SVP/ Chief Lending Officer