

From: [Susan Phillips](#)
To: [Director - FASB](#)
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Technical Director, Financial Accounting Standards Board
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I am the President and CEO of Citizens Bank of Blount County, a community bank in Maryville, TN. I'm writing in opposition to the FASB proposal to require banks to mark all instruments on bank balance sheets to market value. Loans are made in our community bank based on many variables which may not be fairly measurable in a "template" mark-to-market approach. The bank's ability to make loans, its primary source of profitability, would be seriously hampered by the need to meet market objectives instead of risk management and customer service.

Securities available-for-sale are now marked to market, but the value is based on an active trading market across the country. Our community loans cannot meet a federal, national format in order to measure favorably for market valuation.

Please consider the unnecessary impact on community banks at a time when the economy is leading to unprecedented stresses. The change to market value for all balance sheet items is not needed, and would not serve my employer and myself.

Sincerely,

Joe Bruce
President &
Chief Executive Officer
Citizens Bank of Blount County

Susan Phillips
1st Vice President
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