

September 14, 2010

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

RE: Accounting for Financial Instruments and Revisions to Accounting for Derivative Instruments and Hedging Activities.

I am writing on behalf of American Trust and Savings Bank in Dubuque, Iowa with regard to the item referred to above. We understand that within the proposed changes in this rule bank loans would be subject to "Market" valuation. We assume you are aware that almost all bank loan accounts are made with no intention of creating a market for sale. In fact, it is the opposite premise. Loans made within community banks in general are to assist borrowers needs for capital, growth, inventories, community needs, personal needs and numerous other purposes.

This has been the core purpose for lending for ages. To attempt to create "Market" value for such assets would be harmful and an unnecessary impact on our business, our industry and our economy. We respectfully urge you to not implement this rule so as to adversely change the core purpose of bank lending.

Thank you for your time and consideration.

Sincerely,

Gary McAndrew
Sr. Vice President