

600 East 84th Avenue Merrillville, IN 46410-6366

September 15, 2010

Mr. Russell Golden Technical Director Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

File Reference: No. 1810-100 Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities

Dear Mr. Golden:

Thank you for the opportunity to comment on the exposure draft Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities ("proposal"). Centier Bank is a family owned community bank with \$2 billion in assets. Our bank is a very traditional and conservative financial institution. We make every effort to manage our interest rate, liquidity and credit risks to protect our going concern value. The value of our bank is more reliant on the image we portray in the communities we serve than on the complexity this proposal would add to our financial statements. The bank's latest annual report consisted of four pages of financial statements and 33 pages of footnote disclosures required by GAAP. This proposal will not make the financials more transparent, but only change them in a manner that will not reflect the business model we have consistently operated within for years. The bank has only sold an insignificant amount of assets a few times in the thirty years that I have served as the Comptroller. This proposal would require financial reporting to focus more on the liquidation value of the \$1.6 billion in loans on our balance sheet than on the value our true business model relies on.

Thank you for considering my views. Please feel free to contact me if you would like to discuss my concerns at 219-755-6196 or jerpeldi@centier.com.

Sincerely,

Joseph C. Erpelding

Vice President & Comptroller

Centier Bank