September 16, 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:

I am writing to express my deep concerns and strong opposition to the portion of the proposed "Mark to Market" rule that requires my bank to basically fabricate a market value for the loans in its portfolio. From a bank investor's perspective, this will cloud transparency rather than improve it, and put into question the most critical element of bank financial statements: bank capital.

I don't care about the market value of the loans; I care about how the loans perform. That's how I get a return on my investment.. My other concern is that this proposed rule would further burden the bank with expensive procedures to determine what the market value of all the loans may be. This further impairs the return on my investment.

This rule is a bad idea. It won't improve the accuracy of the bank's financial statements but it will negatively impact the bank's financial performance.

Thanks for considering my point of view.

Sincerely,

Timothy J. Clarke

Investor in Community Banks