

Mr. Russell Golden Technical Director Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5118

Re: FASB Fair Value Proposal

Dear Mr. Golden,

As President and CEO of Banner County Bank, a \$55,000,000 community bank in rural western Nebraska, I thank you for the opportunity to comment concerning the Fair Value and Loan Impairment portions of the proposal.

Fair Value – The establishment of a market value on the loans held by this institution would not only be burdensome but extremely difficult with no market for comparison. We do not have any history or experience in originating loans for the purpose of selling the asset. Attempting to report a market value of our loan portfolio would greatly distort our balance sheet. Any changes in the value of an individual loan is promptly accounted for utilizing the requirements set forth by the regulatory agencies so Fair Value is currently being reported without additional limitations and requirements.

Loan Impairment – In my 27 years of banking I have watched the loan loss reserve methodologies change and re-change trying to satisfy the current economic cycle being experienced. I would respectfully request that any proposed changes be thoroughly modeled and tested in banks similar to Banner County Bank prior to enactment. i.e. The recent FAS 166 has greatly impacted my bank in handling loan participations. I strongly feel that the impact of FAS 166 was not necessarily directed at loan participations but none the less I am forced to comply with the indirect implications.

Thank you for considering my comments.

Sincerely,

Roger Wynne, President/CEO

Banner County Bank