September 17, 2010

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

Dear Mr. Golden:

Thank you for the opportunity to comment on File Reference No. 1810-100 Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities.

As a bank investor I have three major reasons that I am in opposition to this proposed legislation.

- 1. Marking loans to market shifts the focus away from loan performance and to the defined value as a loan at any point in an economic cycle. This distorts the balance sheet and distracts us from what is truly important; the loan portfolios ability to repay on time.
- 2. This proposal would cause a bank to change investment strategies. A community bank whose primary investment is loans would be discouraged from making loans because of the uncertainty of future valuations. At a time when banks are being encouraged to preserve small business lending, this proposal would seem to be counterproductive.
- 3. I see no support for this from bank regulators. With this in mind, I recommend that you drop this proposal to mark loans to market as, from my perspective, it has no benefit to investors, customers or regulators.

Please contact me at 563-659-9410 or at the address listed below if you would like to discuss my concerns.

Sincerely,

Kent K. Kennedy 1418 12th Avenue

DeWitt, Iowa 52742