September 29, 2010

Mr. Russell Golden Technical director Financial Accounting Standards Board 401 Merritt 7 P.O. box 5116 Norwalk, CT 06856-5166

RE: File Reference #1810-100

Mr. Golden,

I appreciate the opportunity to comment on the exposure draft, "Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities."

I am the Chairman and CEO of Security State Bank in Fergus Falls, Minnesota. We have approximately \$130,000,000 in assets.

Constantly valuing each individual loan with market ups and downs, where there is no established market, or even a quote of value, would be superficial and not realistic.

The investment banks and securitization of loans does need to be closely regulated, but requiring constant monitoring of community loans is not necessary. It would, in fact, cause more time, expense, and paperwork, diverting attention from basic commonsense lending.

You must exempt community banks from a requirement of fair market loan valuations.

Sincerely,

Paul Lindholm Chairman & CEO Security State Bank 218-736-5485

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