From: rich@fwbt.com
To: Director - FASB

Subject: File Reference: No. 1810-100, "Accounting for Financial Instruments and Revisions to the Accounting for

Derivative Instruments and Hedging Activities"

Date: Tuesday, September 21, 2010 1:32:32 AM

Richard Campbell 900 South Broadway Minot, ND 58701-4658

September 20, 2010

Russell Golden Technical Director Financial Accounting Standards Board 401 Merritt 7, PO Box 5116 Norwalk, CT 06856-5116

Dear Mr. Golden:

Thank you for the opportunity to comment on a couple of changes proposed for bank accounting of our loan portfolio. I am EVP-Chief Lending Officer at a \$570MM bank in central North Dakota.

I support the Board's efforts to revise the methodology to estimate adequate loan loss provisions. It should be based on anticipated "expected loss" rather than the present "incurred (historical) loss." I do have concerns on how the changes will be implemented. I believe the final model should be tested by banks of various sizes to ensure it is a workable (and most important--accurate) measure to determine a bank's ALLL.

I do not support the proposal for calculating interest income on an after-impairment basis. It should continue to be based on contractual terms to avoid making the accounting confusing and subject to various interpertations by bankers, regulators and auditors.

I strongly oppose the proposal to mark to market our loan portfolio. It is not necessary for most community banks. We do not sell our loans. Our bank is closely held and there is no need to complete this burdensome process for "the general investing public" as our stock is not publicly traded. The costs and resourses required to complete this process are completely unnecessary for most community banks including ours.

Sincerely,

Richard Campbell EVP First Western Bank & Trust Minot, ND

Sincerely,

701-852-3711 Executive Vice President-Chief Lending Officer First Western Bank & Trust