

From: bsturm@couleebank.net
To: [Director - FASB](#)
Subject: Comments on No. 1810-100, "Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities" Exposure Draft
Date: Wednesday, September 22, 2010 2:55:20 AM

Brad Sturm
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LaCrosse, WI 54602-0845

September 21, 2010

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

Dear Mr. Golden:

As a Wisconsin community banker, I am writing to urge FASB to not go forward with the proposal.

The primary business of community banks is to hold financial instruments to collect contractual cash flows, not to trade them on a regular basis. Given no active market; it would be very difficult and costly to mark them to market.

Establishing fair values for the types of loans held by many community banks like our bank would be costly and result in data of questionable reliability. The data generated would provide little benefit to me in managing my community bank. In addition the expanded reporting of comprehensive income is unnecessary, confusing and of little use to most financial statement users.

So far, Coulee Bank has been able to weather the storm of this "Great Recession" however my fear is these new rules will create more apprehension about financial markets to include well run community banks. The proposed accounting changes will exacerbate cyclicalities in financial results due to the greater reliance on fair value measurements, and potentially lead customers and the public to erroneous conclusions.

Thank you for the opportunity to comment on this proposal.

Sincerely,

Brad Sturm
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