From: Stephanie Singleton [mailto:cicostcu@airmail.net]

Sent: Tuesday, May 14, 2013 11:31 AM

To: Director - FASB

Subject: 2012-260 Proposal

The unexpected cost with this new proposal would be a total nightmare. I run a small credit union, under \$20M. This proposal would cause this credit union to have Corrective Action. We have a hard time anyway with the costs of doing business. I have been in this business for well over 20 years and the new proposal does not make any sense. Calculating the historical loss makes sense. What about a formula? I am all for updating things or changes, but why change something like this if it is not broke? Please consider not changing the way we calculate ALLL!

Thank-you for your time, Stephanie Singleton President Cicost Federal Credit Union