## Thomas T. Dunbar

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> June 25, 2010 (Via U.S. Mail)

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

**Re:** File Reference #1810-100

Accounting For Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities

Dear Mr. Golden:

My family is an investor in a small community bank in Central and South Mississippi. The proposal to "Mark to Market" will mischaracterize the financial strength of Priority One Bank.

As I understand it, they have some preferred shares of several banks' issues.

The preferred issues involve obligations of 20 or more banks as I understand it to pay dividends to Priority One. Those dividends can be delayed but then run cumulatively and for later payment.

The "Mark to Market" rule would require that the value of these preferred holdings be marked down unfairly and unrealistically. It would affect the capital structure of the bank unfairly as well.

Therefore, for this reason and similar reasons I respectfully request that you consider not instituting any changes that would unfairly penalize the viability of community banks across the country in similar situations.

Sincerely,

Thomas T. Dunbar