September 1, 2010

Technical Director
Financial Accounting Standards Board
RE: File Reference No. 1810-100

Via: email - director@fasb.org

## To Whom It May Concern:

Please be advised of my opposition to mark-to-market accounting for most financial instruments, but especially loans. Mark-to-market accounting may work well in a normal market for liquid traded securities. However, we all bore witness to the price volatility of some of the safest securities during the recent crisis.

There is no adequate way to value a loan and its underlying collateral as though it were a liquid security. If we move to mark-to-market accounting, I and many of my investor colleagues believe there will be wild swings in any give period simply based upon an abstract decision on what a loan is worth, which will in turn show wide swings in what a bank is worth, when in reality nothing has changed. I believe this will cause more confusion for investors rather than creating transparency.

Lastly, I believe there will be additional negative consequences of this proposal. If bankers have to mark loans to market and be measured on it by investors, regulators and depositors, it is very possible there will be no fixed rate, long-term lending unless the bankers are sure they could sell the loans without incurring large losses.

Please kill this mark-to-market accounting proposal.

Sincerely,

Randall C. Hall, CPA, MBA, CRP Asheville NC hall randall@bellsouth.net