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File Reference No. 1810-100

Technical Director, Financial Accounting Standards Board

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I'm an officer in a community bank, in Maryville, TN. I'm writing in opposition to the FASB proposal to require banks to mark all instruments on bank balance sheets to market value. Loans are made in our community bank based on many variables which may not be fairly measurable in a "template" mark-to-market approach. The bank's ability to make loans, its primary source of profitability, would be seriously hampered by the need to meet market objectives instead of risk management and customer service.

Securities available-for-sale are now marked to market, but the value is based on an active trading market across the country. Our community loans cannot meet a federal, national format in order to measure favorably for market valuation.

Please consider the unnecessary impact on community banks at a time when the economy is leading to unprecedented stresses. The change to market value for all balance sheet items is not needed, and would not serve my employer and myself.

Sincerely,

***Kathy Bowers***

First Vice President  
Citizens Bank of Blount County  
P.O. Box 9730  
Maryville, TN 37802