

From: bvavra@bankiowabanks.com
To: [Director - FASB](#)
Subject: File Reference: No. 1810-100, "Accounting for Financial Instruments and Revisions to the Accounting for Derivatives Instruments and Hedging Activities"
Date: Monday, September 13, 2010 9:17:59 AM

Robert Vavra
701 W Sheridan Avenue
Shenandoah, IA 51601-1741

September 13, 2010

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

Dear Mr. Golden:

Thank you for the opportunity to comment on the exposure draft, "Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities."

As President of Bank Iowa, a banking institution in Shenandoah, Iowa with \$130,000,000 in total assets, I am writing to express my opinions on specific provisions of the exposure draft.

I am strongly opposed to the portion of the proposal that requires all financial instruments - including loans - to be reported at fair value (market value) on the balance sheet.

Our bank does not sell our commercial loans. Basing our balance sheet on fair values leads readers of our financial statements to assume that we will sell the loans, which is not the case.

There is no active market for many of our loans, and estimating a market value makes no real sense.

Marking all loans to market would cause our bank's capital to sway with fluctuations in the markets - even if the entire loan portfolio is performing. Instead of providing better information about our bank's health or its ability to pay dividends, the proposal would mask it.

The costs and resources that we will need to comply with this new requirement would be significant. This will require us to pay consultants and auditors to estimate market value.

For the reasons stated above, our bank respectfully requests that the fair value section of the exposure draft be dropped.

This rule destroys the very purpose of a financial intermediary by assigning a market value to an unmarketable asset. Financial intermediaries (banks) use deposits to make illiquid loans. Imposing an artificial accounting rule on these basic financial transactions will destroy commercial banking and create a whole new credit crisis.

Thank for considering my views.

Sincerely,

Robert Vavra
7122461311