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I write with great concern over the proposal to require the banking industry to adopt fair value standards for all financial assets. I have been an investor in bank stocks for many years and review the financial reports of organizations that I invest in for long term value of my investments. I fear that by adopting fair value accounting, it would distort the financial statements that I review. Having worked as a CEO of two community banks for 28 years, I know that banks hold the majority of financial assets as longer term investments. The only short investments (other than by maturity) are loans and securities acquired with the intention of being sold in the short run. These assets that are acquired to be sold currently are marked to market. To assign this same accounting treatment for financial assets intended to be retained would give a good picture of the potential value of the company *only* if the assets or the entire company were to be sold in the short run. This is generally not the reality of most ongoing financial institutions. I believe most investors are reviewing the financials of the banks they invest in based on the long run performance capabilities of the banks.

The current fair value reporting contained within in the footnotes of the financial statements is ample to allow investors to review the immediate fair value of the banks. Fair value accounting for all financial assets could create wide swings in the financial reports of many banks and make the financial statements very confusing for investors to compare on an annual or even quarterly basis as financial cycles can change in very short periods of time. Also, this rule would contain no benefit for the banks but instead would increase their operating costs by necessitating expensive computer programming. It would also affect regulatory reporting for the banks. I am not interested in seeing increased expense for companies I invest in with little to no benefit in return.

As an investor in stocks of the banking industry, I urge you NOT to adopt fair value accounting for all financial assets of commercial banks.

Respectfully,

Charles J. Dolezal