From: dstauduhar@communitybankmissoula.com
To: Director - FASB
Subject: File Reference: No. 1810-100, "Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities"
Date: Thursday, September 16, 2010 12:08:07 PM

Doug Stauduhar
3010 American Way
Missoula, MT 59808-1677

September 16, 2010

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

Dear Mr. Golden:

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

As CFO of Community Bank - Missoula, Inc, a banking institution in Missoula, MT with $85 million in total assets, I am writing to express my oposition to the Mark to Market proposal.

We do not want readers of our financial statements to think we are in the business of selling our commercial loans. Listing fair value on our balance sheet will make it appear as though our loan portfolio is always available for sale.

We do not have an active market for selling our loans. There is no basis for calculating an estimated market value.

In the event a borrower's ability to repay is questionable, we work through the collection process with the borrower, we do not sell the loan.

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.

We should not have to explain to our customers why our capital fluctuates when we have a solid, performing loan portfolio that we took great care in building.

Our consulting and auditing expenses are high enough without adding the extra charges associated with determining a market value of our loan portfolio.

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

Sincerely,

Community Bank - Missoula, Inc,

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