

**From:** [buergercpa@fuse.net](mailto:buergercpa@fuse.net)  
**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:** Friday, September 17, 2010 12:28:01 PM

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Bernard Buerger  
2110 Beechmont Ave  
Cincinnati, OH 45230-1621

September 17, 2010

Russell Golden  
Technical Director  
Financial Accounting Standards Board  
401 Merritt 7, PO 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 Mt. Washington Savings and Loan, a mutual savings institution in Cincinnati, Ohio with \$ 70 million in total assets, I am writing to express my opinion on the proposed marked to market rules.

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 institution does not sell our mortgage loans. Many of our loans are not salable on the secondary market due to underwriting issues or other issues required by secondary buyers. As a result it would be virtually impossible for us or our outside auditors to determine a " market value" for these assets. Since it is our expectation that the loans would be paid in full over the life of the loan we have already made a determination that the loans are worth the face value of the loan. To make unreliable estimates of the value of these assets due to changing market conditions will only add unnecessary volatility to our financial statements and our financial condition. The changes currently proposed could destroy our capital position built up over the 124 years of our existence.

As a mutual company our only source of capital is our build up of earnings over time. Since we do not have investors in the market sense these changes would cloud our financial position instead of making it more transparent. Unreliable estimates of changing market values will not make our financial condition more reliable or transparent to savers or regulatory agencies.

The costs and resources that we will need to comply with this new requirement would be significant. We only have six full-time employees. This will require us to pay consultants and auditors to estimate market value. This additional cost does absolutely nothing to make our institution more profitable or financially strong. The only result of this

proposal would be to make our financial results less reliable.

For these reasons our institution requests that the fair value section of the exposure draft be dropped.

Sincerely Yours

Bernard G. Buerger, CPA  
President  
Mt. Washington Savings and Loan Company  
2110 Beechmont Ave.  
Cincinnati, OH 45230

Sincerely,

513-231-7871  
President  
Mt. Washington Savings and Loan Company