From: Bill Norton
To: Director - FASB
Subject: Proposed Mark to MArket for commercail bank loans
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Technical Director
Financial Accounting Standards Board
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As a shareholder of four local community banks, I wish to express my thoughts on the proposed changes, whereby the commercial loans held by the banks would be "marked to Market."

First, this would add substantial costs for valuing the loans, I am a CRE and do some of this for a living. If the standard required an appraiser, the cost would be even more. An appraisal is a "stated opinion of value at a specific point in time, subject to limiting conditions." Hence it is art as much or more than science.

The smaller (less than $1 Billion) community banks know their customers and live in their communities. They look for two or sometimes three ways to be re-paid. The loan to more conservative standards and do so in their own back yards. This proposal is an overburden and will discourage lending to small business which is exactly what we need on Main Street right now! Keep in mind that 70+ % of all new jobs come from small businesses and thus raising the bar to borrowing for expansion and job creation is the exact opposite of what we should be doing.

Go ahead and regulate your big banks (those too big to fail) but leave our small, locally owned community banks alone!

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