

From: dcamac@durandstatebank.com
To: [Director - FASB](#)
Subject: Comments on No. 1810-100, "Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities" Exposure Draft
Date: Monday, September 20, 2010 9:17:58 AM

David Camac
1005 Cameron Dr.
Durand, IL 61024-9005

September 20, 2010

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

Dear Mr. Golden:

I am the VP, Cashier, IT Director, BSA Officer, Security Officer, Operations Officer (well, you get the picture) of Durand State Bank, a \$90 million bank owned by a single bank holding company in Durand, Illinois in the middle of the corn fields, about 5 miles south of the Wisconsin state line.

The cost of the this proposal to a bank our size will be horrendous. Most of my time is spent just trying to stay up on all of the regulatory compliance points on which we are examined. That is a lot of money for a small bank to spend just trying to stay out of regulatory compliance trouble.

A change like this will not only add an undue burden on our already strapped budget to make the changes necessary to accommodate the accounting change, it will add another layer of regulatory scrutiny.

Perhaps at my age, I have become a cynical person, but I am convinced that there is a move afoot to close as many small town banks as possible. We are being regulated out of existence. A proposal such as this, while perhaps not intended as such, is just another nail in our coffin.

I will retire in a couple of more years. I had hoped that I would be able to bank at that small town community bank when that happy circumstance comes to pass. I don't believe that will happen. My checking account will be with the institution to which my bank is forced to sell, unless those who make the decisions like the one you are considering take into account the differences between the asset and liability structure of small rural banks compared to those of the large mega-banks who seem to be adept at being "creative".

Please reconsider this folly.

Sincerely,

D.E. "Mac" Camac

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