

September 23, 2010

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

File Reference: NO 1810-100 Acctg for Financial Instruments
and Revisions to the Acctg for Derivative Inst. + Hedging

Dear Mr. Golden,

It is my belief that the accounting suggested in
this exposure draft:

- Is not relevant to the commercial banking business model.
- Will undermine the reliability in bank capital levels
- Will decrease significantly comparability between banks
- Introduces complexity where complexity is neither needed or desired
- Will add significant costs to banks

And most importantly will make financial statements which are already extremely difficult for end users to understand even more difficult to understand and compare.

Sincerely,

Debbie Lee, Raleigh NC