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September 27, 2010

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

File Reference: No. 1810-100 Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities

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. I am a CPA, small business owner and bank director and investor in First National Bank & Trust of Ardmore, Oklahoma. From a CPA and bank investor perspective I am very concerned that mark-to-market accounting would significantly alter our bank's financial information and only serve to confuse its users.

As an investor and director, I am interested in the historical performance of our loan portfolio. Current value, even if it could be accurately determined, is not meaningful. What is meaningful is an accurate identification of factors that could affect the collectibility of our loan portfolio. First National Bank & Trust follows conservative guidelines to establish a reserve for loan losses. Potential losses from loans with significant collection or collateral deficiencies are reflected in the reserve.

Our bank has been inundated with regulatory and compliance requirements. Valuable resources are now dedicated to follow the rules that take away the bank's ability to serve its customers. Mark-to-market would only serve to add to this burden without giving investors meaningful and useful information.

I hope that the Board would reconsider the proposed change and drop the mark-to-market rule change.

Thank you for the opportunity to express my views.

Sincerely, Luam Wacker Luann Walker