

From: cw@illinoisstatebank.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: Thursday, September 30, 2010 12:33:25 PM

Chester Ward
1301 Pyott Road
Lake in the Hills, IL 60156-9794

September 30, 2010

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

Dear Mr. Golden:

I appreciate the opportunity to give comment on FASB's Exposure Draft: Accounting for Financial Instruments and Revisions to the Accounting for Derivative Instruments and Hedging Activities.

This letter requests that you do not change the current regulation. This is written to urge FASB not to implement this proposal. The costs to implement the FASB proposed amendment will be paid by the small business and this change is not consistent with international accounting Standards

Illinois State Bank generates and holds small business loans in our immediate market area. It would be very difficult for the bank to mark these assets to market value. If the assets were marked to market, an appaisal would be required. the cost would be passed to the Borrower. Appraisals would be costly to the Borrower. The additional cost burden to the small business would be counter productive to an economic recovery cycle. It is argued that this additional cost, paid by the Borrower, would not help during an economic recovery.

Finally, we oppose the proposed amendment as it is in conflict with international accounting standards. FASB is suggesting that a mark to market strategy be implemented that is not consistent with IASB. There should not be changes implemented by FASB that establishes different standards than IASB for reporting financial positions.

I do appreciate your time and the opportunity to comment on this proposal.

Sincerely,

Chester V. Ward
847-658-4848