



EAST WISCONSIN

SAVINGS BANK S.A.

December 9, 2010

Corporate Office
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Phone: (920) 766-4646
www.eastwis.com

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

RE: File Reference No.1880-100 *Clarifications to Accounting for Troubled Debt Restructurings by Creditors*

Dear Technical Director:

East Wisconsin Savings Bank appreciates the opportunity to comment on the exposure draft *Clarifications to Accounting for Troubled Debt Restructurings by Creditors* (ED). East Wisconsin Savings Bank is a community bank with \$243 million in assets serving the East Central region of Wisconsin. East Wisconsin Savings Bank understands the concerns with the identification and reporting of troubled debt restructurings (TDRs). However, we are opposed to the ED, as the ED proposes changes that will make the process to evaluate loan modifications unnecessarily difficult and complex, and it also misses the point on whether or not the related loans pose increased credit risk to the bank.

East Wisconsin Savings Bank is a 123 year old, 1-4 family portfolio thrift. This proposal will add unnecessary and expensive accounting and management that is not beneficial to our organization or our customers/members.

The changes proposed will, if implemented, require many changes to our processes to identify TDRs. These processes are based on certain specific guidance issued by our regulators and auditors in the past. For example, taking away past guidance provided by the Office of the Comptroller of the Currency and the Center for Audit Quality will add considerable complexity to that process. If we do not provide the documentation required to support the evaluation of the loan modification, we will likely be required to, by default, report the modification as a TDR. The amounts reported will then contain many cases of legitimate loan modifications whereby no significant concession has been provided. We do not believe this will result in better

Other Locations

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Phone: (920) 759-0532

Freedom Office
N3947 Columbia Avenue
Freedom, WI 54130-7553
Phone (920) 788-6341

Kimberly Office
220 W. Kimberly Avenue
Kimberly, WI 54136-1410
Phone: (920) 788-3522

Greenville Office
W6318 Wisconsin Avenue
Suite #4
Greenville, WI 54942-8607
Phone: (920) 757-9770

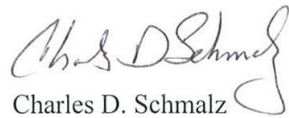
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financial reporting. Further, we do not even have the information available to perform any kind of retrospective reporting of these modifications.

The ED also emphasizes the current standard's market-based trigger in identifying a TDR. The market trigger is the biggest problem in the current TDR analysis. Because of complexities related to specialized terms, collateral and personal guarantees applied to loans, it is difficult to determine a "market" interest rate on most loans. However, even when a market rate is available, when the rate is not increased to the current "market", we do not agree that a TDR should be reported when additional collateral and/or guarantees have been provided and the resulting loan terms add no more credit risk to the bank.

Thank you for your attention to these matters and for considering our views. Please feel free to contact me at (920) 766-4646 or cschmalz@eastwis.com if you would like to discuss our views.

Sincerely,



Charles D. Schmalz
President
East Wisconsin Savings Bank

CDS/cg