From:	Beals, Yanett
To:	Director - FASB
Subject:	RE: Topic 825: Disclosures about Liquidity Risk and Interest Rate Risk
Date:	Wednesday, September 19, 2012 10:20:13 AM

Ms. Susan M. Cosper, Technical Director
File Reference No. 2012-200
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Dear Financial Accounting Standards Board:

Our bank, Community Bank of Florida, currently has in excess of $500 million in assets. We prepare and utilize for reporting purposes an extensive Interest Rate Risk Analysis each quarter, with expertise
assistance. We also prepare a monthly and quarterly review of the company's liquidity profile.

The proposed additional disclosure requirements on Interest Rate Risk and Liquidity may result in inaccurate representation of overall risk to the bank due to standardization of measurement and send conflicting messages regarding risk.

The proposed disclosures appear to be more applicable to large banks and not of value to financial statement readers of 6,000± community banks.

In addition, these extensive requirements will add to the burden and costs to community banks without relation to usefulness.

Our strong feelings against the proposal are in detail presented by our Consultants, Darling Consulting Group, in their September 14, 2012 communication to your Board.

We urge the Financial Standards Board to reconsider implementation of these requirements for community banks, and not create disclosure with suspect value.

Sincerely,

Yanett Beals

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Community Bank of Florida
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The following people have submitted the same comment letter as the one shown:

Debra A. West

Robert L. Epling

Ron Keller

Davindrel Sahatoo

Maria McGlocklin

Susan Carter

George H. Cooper Jr.

Daniel P. Lipe

Aileen Fundora

Jerry D. Weisman

Denise Held

Amanda S. Garner

Amber Yunus

M. Renee Reichling

Gail M. Copa

Martina Borek