

**From:** Rick Kunze [mailto:rkunze@tablerockbank.com]  
**Sent:** Tuesday, October 15, 2013 10:35 AM  
**To:** Director - FASB  
**Subject:** FASB proposed changes

October 15, 2013

Mr. Russell G. Golden  
Chairman  
Financial Accounting Standards Board  
401 Merritt 7  
Norwalk, CT 06856-5116

Re: Proposed Accounting Standards Update: Financial Instruments—Credit Losses

Dear Mr. Golden:

My name is Rick Kunze and I am the President of the State Bank of Table Rock. I am writing to you today to express serious concerns regarding the proposed accounting standards update on impairment for loans and securities currently under deliberation by the FASB. My community bank, along with thousands of others like mine throughout the United States, is a small, relationship-based institution that serves the local community through customized lending that is tailored to specific customer needs. I lend in my community based on relationships I have built with my customers over many years. The proposed expected credit loss model, with its reliance on complex modeling techniques and front loading impact on loan loss provisioning, is simply the wrong approach to properly providing for future credit losses.

I acknowledge the need to overhaul the current incurred loss model and its reliance on incurred loss events to drive the recognition of credit losses. Had community banks been able to provide for expected credit losses sooner in the credit cycle, many of the recent strains placed on community banks would have been easily avoided. This is why I am asking you today to adopt the alternative proposal put forth by the Independent Community Bankers of America.

The proposal set forth by ICBA relies on historical loss observations for similar assets as the primary driver for initially building the loan loss reserve. As loans and securities become impaired where a loss is probable, my institution would be allowed to increase the reserve based on a specific measurement of impairment considering the value of all relevant loss mitigation alternatives. ICBA's alternative proposal properly builds the necessary allowance in a ratable fashion that matches the credit risks inherent in the financial instrument with its earning potential. Additionally, reserves are recognized sooner in the credit cycle, which meets FASB's objective in reforming the shortfalls exposed during the recent credit crisis. Most importantly, the alternative proposal removes the day-one-loss concept from the equation, a provision that would greatly harm community banks nationwide.

We are already having issues with over regulation from the upcoming changes in Mortgage lending to the point of making it difficult to make loans for homes and home repairs in our small communities. Continued increases if these types of regulations will in effect cause our small communities to lose their community banks and slowly die out. Without the ability to help people many of the low income and elderly there will be an even broader affect to our communities survival.

Thank you for taking the time to consider my concerns with the proposed expected credit loss model. If you have any questions or would like additional information, please do not hesitate to contact me at 402-484-5444 or [rkunze@tablerockbank.com](mailto:rkunze@tablerockbank.com).

Sincerely,

*Rick L. Kunze*  
*President*  
*State Bank of Table Rock*  
*4125 Main*  
*Roca, NE 68430*  
*402-484-5444*



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The following people have submitted the same comment letter as the one shown.

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ERIC ALLEN	TIB
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DREW ALLBRIGHT	TIB
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RENEE LONG	MERCHANT AND PLANTERS BANK
TARA SALINAS	MERCHANT AND PLANTERS BANK
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ROGER MERICLE	CORNERBANK, N.A.
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STEVEN BALES	WEST VALLEY NATIONAL BANK
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WADE O'NEAL	GUARANTY BANK AND TRUST
MARK EMMERT	DART BANK
VINCE COLEMAN	SOUTHERN COMMERCIAL BANK
CHARLIE G. STUCKEY	PEOPLES STATE BANK & TRUST
BRAD WOOLARD	SUCCESS BANK
ROBERT J. FENTON	SOLERA NATIONAL BANK
BRAD DAY	QUANTUM NATIONAL BANK
WILL WALKER	TRADERS AND FARMERS BANK
BRAD BIXLER	GREENVILLE NATIONAL BANK
BOB COCKRELL	BANK OF SPRINGFIELD
JOE SHIMALA	LIBERTY SAVINGS BANK, FSB
KEVIN LENIHAN	CROWN BANK
ROBERT DICKSON	THE FIRST NATIONAL BANK OF FAIRFAX MINNESOTA



EILEEN M. BUDNICK	NORTHERN MICHIGAN BANK
GEORGE FERRIELL	BATH STATE BANK
JOHN KING	THREE RIVERS BANK OF MONTANA
CINDY BENNETT	WESTERN HERITAGE BANK
JOHN DENKLER	FIRST STATE COMMUNITY BANK
BRAD SCHUSTER	FIRST STATE COMMUNITY BANK
DONALD THOMPSON	FIRST STATE COMMUNITY BANK
JUDY PAYNE	FIRST STATE COMMUNITY BANK
BECKY WADE	FIRST STATE COMMUNITY BANK
WILLIAM MOWRER	FIRST STATE COMMUNITY BANK
KEITH GRANTHAM	FIRST STATE COMMUNITY BANK
KEVIN L. COOK	FIRST STATE COMMUNITY BANK
DANIEL DEGONIA	FIRST STATE COMMUNITY BANK
DAVE DEGONIA	FIRST STATE COMMUNITY BANK
ED WEIBLE	FIRST STATE COMMUNITY BANK
SHAWN MEINERSHAGEN	FIRST STATE COMMUNITY BANK
JAMES EATON, JR.	FIRST STATE COMMUNITY BANK
GARY SCHUMER	FIRST STATE COMMUNITY BANK
RICHARD DEWILDE	FIRST STATE COMMUNITY BANK
PAT MCDOWELL	FIRST STATE COMMUNITY BANK
GREG ALLEN	FIRST STATE COMMUNITY BANK
RICHARD CASH	FIRST STATE COMMUNITY BANK
STUART M. LANDRUM, JR.	FIRST STATE COMMUNITY BANK
KEITH HUTSON	FIRST STATE COMMUNITY BANK
HARRY H. PETERSON, II	FIRST STATE COMMUNITY BANK
TERESA GRINDSTAFF	FIRST STATE COMMUNITY BANK
JAMES POLITTE	FIRST STATE COMMUNITY BANK
DENNIS BLAIR	FIRST STATE COMMUNITY BANK
MATTHEW SEBASTIAN	FIRST STATE COMMUNITY BANK
EVAN WILLIAMS	FIRST STATE COMMUNITY BANK
PAUL BROCKMILLER	FIRST STATE COMMUNITY BANK

HARRY L. JENNINGS	FIRST STATE COMMUNITY BANK
KINCH JONES	FIRST STATE COMMUNITY BANK
TIME WHITED	FIRST STATE COMMUNITY BANK
JERRY WEST	FIRST STATE COMMUNITY BANK
KEVIN BOREN	FIRST STATE COMMUNITY BANK
BART ACKLEY	FIRST STATE COMMUNITY BANK
DARRIN STRANGE	FIRST STATE COMMUNITY BANK
VICKI OBERLE	FIRST STATE COMMUNITY BANK
MARK WILLIAMS	FIRST STATE COMMUNITY BANK
HOWARD WOOD	FIRST STATE COMMUNITY BANK
DOUGLAS DRAPER	FIRST STATE COMMUNITY BANK
GREG REDFIELD	FIRST STATE COMMUNITY BANK
STOKELY WISCHMEIER	FIRST STATE COMMUNITY BANK
GARY DOYEN	FIRST STATE COMMUNITY BANK
DEBBIE POLITTE	FIRST STATE COMMUNITY BANK
DAVID FOSTER	FIRST STATE COMMUNITY BANK
MATT TANNER	FIRST STATE COMMUNITY BANK
ANDREW J. AGERS	FIRST STATE COMMUNITY BANK
KEVIN ROBERTS	FIRST STATE COMMUNITY BANK
TODD MAHN	FIRST STATE COMMUNITY BANK
SHERYL BOYD	FIRST STATE COMMUNITY BANK
STEVE MATTHEWS	FIRST STATE COMMUNITY BANK
RICHARD B. FRANCIS	FIRST STATE COMMUNITY BANK
DENNIS GANNON	FIRST STATE COMMUNITY BANK
SPENCER TAYLOR	FIRST STATE COMMUNITY BANK
LLOYD STONER, II	FIRST STATE COMMUNITY BANK
RICHARD ADAMS	FIRST STATE COMMUNITY BANK
JOHN LEIBLE	FIRST STATE COMMUNITY BANK
RON WATKINS	FIRST STATE COMMUNITY BANK
PAUL BRADFORD	FIRST STATE COMMUNITY BANK
DON ROGERS	FIRST COMMERCIAL BANK

JIM PIETERS	HIGH PLAINS BANK
AMY L. EMSHOFF	GENERATIONS BANK
L.J. FOLSE	COASTAL COMMERCE BANK
VINTAGE BANK	JEFF FRAZIER
MEGAN GLUECK	FIRST BANK OF THE LAKE
ALEXANDRIA TULL	FIRST BANK OF THE LAKE
MICHAEL PROBASCO	FIRST BANK OF THE LAKE
GREGORY BONNER	FIRST BANK OF THE LAKE
RACHEL CHRISTENSEN	FIRST BANK OF THE LAKE
AUTUMN BITTNER	FIRST BANK OF THE LAKE
DANA WYRICK	FIRST BANK OF THE LAKE
ANGELA JESSE	FIRST BANK OF THE LAKE
JESSICA NORRELL	FIRST BANK OF THE LAKE
BRITTANY ROUSE	FIRST BANK OF THE LAKE
JEANNIE NEUMAN	FIRST BANK OF THE LAKE
BARBARA NELSON	FIRST BANK OF THE LAKE
ROBERT WILLIAMS	FIRST BANK OF THE LAKE
JOHN C. MCGEE	FIRST CITY BANK OF FLORIDA
YVONNE STEELE	FIRST CITY BANK OF FLORIDA
ROBERT E. BENNETT, JR.	FIRST CITY BANK OF FLORIDA
WILMA VAN LEEUWEN	FIRST CITY BANK OF FLORIDA
IRIS WALTON	FIRST CITY BANK OF FLORIDA
TIMOTHY P. VAN DAM	FIRST CITY BANK OF FLORIDA
WILLIAM H. TINSLEY	FIRST CITY BANK OF FLORIDA
PATRICIA RYAN	FIRST CITY BANK OF FLORIDA
KEVIN JOHNSON	FIRST CITY BANK OF FLORIDA
AMANDA B. GOSNELL	FIRST CITY BANK OF FLORIDA
STEVE CALDARELLI	FIRST CITY BANK OF FLORIDA
DONNA KIDNEY	FIRST CITY BANK OF FLORIDA
SCOTT SELKO	BANK OF MEAD
CHAD THOMAS	THE FIRST NATIONAL BANK OF TALLADEGA

TANYA L. COWAN	BUENA VISTA NATIONAL BANK
FRANK SIBLEY	CITIZENS BANK & TRUST COMPANY
WARREN E. WEGGE	DELTA BANK
LARRY D. HURST	TABLE ROCK COMMUNITY BANK
ODEAN BUSBY	PRIORITYONE BANK
BRYAN BOLDT	BANKCHEROKEE
DUANE MUECKE	IOWA STATE BANK
CHRISTOPHER MARTIN	PROVIDENT BANK
MIKE PEARCE	BANK OF THE WEST
RICK DREWS	CENTURY BANK OF GEORGIA
JOHN E. MESERVE	MERRIMAC SAVINGS BANK
PATRICIA KREPS	THE STATE BANK
JERRY O'CONNOR	THE NATIONAL BANK OF WAUPUN
SCOTT BUERGE	METZ BANKING COMPANY
JEFF MCCOY	GREAT SOUTHERN NATIONAL BANK
JOE ANGLIN	PIONEER BANK & TRUST
BLAIN CORNWELL	FIRST NATIONAL BANK
JEFFREY M. STERLING	GERMAN-AMERICAN STATE BANK
TRACI HOLMES	DEL NORTE BANK
MICHAEL HILL	THE CALLAWAY BANK
GREG J. WEED	THE EASTERN COLORADO BANK
MARK SNYDER	THE EASTERN COLORADO BANK
MEGAN HARMON	THE EASTERN COLORADO BANK
BRIAN SCHROEDER	FIRST FARMERS STATE BANK OF MINIER
SCOTT HOEZEE	STATE SAVINGS BANK OF MANISTIQUE
MARK LARCHE	STATE SAVINGS BANK OF MANISTIQUE
DAVE REYHER	COLORADO EAST BANK AND TRUST
LARRY BELLARD	BANK OF ZACHARY
JASON M. IVERSON	FALCON NATIONAL BANK
MYRON SAMS	FIRST NATIONAL BANK OF HUGO-LIMON
TIM DEVITT	SANBORN SAVINGS BANK

BRAD DOBSON	BANK OF SPRINGFIELD
TIM BUCHHEIT	FIRST STATE COMMUNITY BANK/PERRYVILLE, MISSOURI
JAMES S. RANDALL	NORTHSIDE COMMUNITY BANK
EMILY M. HOFER	MERCHANTS STATE BANK
WILLIAM A. COOLLEY	LONGVIEW CAPITAL CORPORATION
PERRY S. ALBIN	LONGVIEW CAPITAL CORPORATION
DAVID M. HEUBERGER	FIRST BANK OF HAMPTON
JEANINE OYER	FIRST NATIONAL BANK IN TREMONT
TRACY EPPS	BANK OF GIBSON CITY
BUTCH POMEROY	INTERNATIONAL BANK OF AMHERST
JASON STRETCH	PRIMESOUTH BANK
MICHAEL PAUL	PLAZA BANK
ALLEN BELL	SEVIER COUNTY BANK
PAUL MARTINSON	GLENWOOD STATE BANK
CHRIS HUNT	COMMUNITY NATIONAL BANK
MICHELLE A. CROOK	BANK OF BOTETOURT
MARGARET NIGHTENGALE	GRANT COUNTY BANK
JOAN HEFFELBOWER	HASTINGS CITY BANK
DAVID W. BARNES	BANK OF FRANKEWING
ROBERT K. BLOODSWORTH, JR.	CHESAPEAKE BANK OF MARYLAND
RAYMOND E. SMITH	THE FIRST NATIONAL BANK IN PHILIP
DENNIS R. MEYER	INDEPENDENCE STATE BANK
JAMES D. BROWN	PROGRESS BANK AND TRUST
BRETT MILLS	FIRST AMERICAN BANK
BOB HARGROVE	THE MURRAY BANK
WADE O. EASLEY	FIRST NATIONAL BANK OF HEREFORD
JEB H. CLARKSON	PIONEER BANK & TRUST
THOMAS MAGNUSON	LYNDON STATE BANK
JOSEPH L. ULWELLING	BORDER STATE BANK
ROBERT J. HAGER	BORDER STATE BANK
JOE DON SHARP	FIRST NATIONAL BANK OF NORTH ARKANSAS

BEN TATE	FIRST NATIONAL BANK OF NORTH ARKANSAS
KIMBERLY BARNES	THE CALLOWAY BANK
PAULA BERTELS	THE CALLOWAY BANK
DAVID A. DASPIT	TEXAS FIRST BANK
MARK SINGLETON	CITIZENS NATIONAL BANK OF TEXAS
WILLIAM R. TALLY, JR.	FREDERICK COUNTY BANK
JAMES R. SMAIL	MONITOR BANK/FIRST NATIONAL BANK
W. RUSSELL CAROTHERS,II	THE CITIZENS BANK OF WINFIELD
KATHY RANKIN	TOMAHAWK COMMUNITY BANK
JOANNE FORSBERG	OREGON PACIFIC BANKING COMPANY
BRANDON LOGUE	THE BATH STATE BANK
ROBERT A. STOVER	THE PEOPLES BANK CO.
MONTE C. HOSTETLER	THE PEOPLES BANK
KENT GAUDIAN	TWO RIVERS BANK & TRUST
WILLIAM C. GLAZE	LONGVIEW STATE BANK
JASON KNOEDLER	BANK OF SPRINGFIELD
JOSEPH VITALE	SENECA FEDERAL SAVINGS AND LOAN ASSOCIATION
DON LUEGER	COMMUNITY NATIONAL BANK
JOHN W. FISHER	FIRST NATIONAL BANK OF ST. IGNACE
JIM GOETZ	SECURITY FIRST BANK OF NORTH DAKOTA
JOHN BELEW	THE FIRST NATIONAL BANK OF TALLADEGA
SCOTT D. BALL	BANK OF SALEM
DENNIS UPCHURCH	CB&S BANK
JOHN ALDRIDGE	CB&S BANK
BRAD REEVES	CB&S BANK
JOHN REEVES	CB&S BANK
REBECCA REEVES	CB&S BANK
MATT COOPER	CB&S BANK
DANNY DAVIS	CB&S BANK
GREG BATCHELOR	CB&S BANK
CECIL BATCHELOR	CB&S BANK

JAMIE VAFEAS	CB&S BANK
JAMES R. MCLEMORE	MIDSOUTH BANK
ROGER STEWART	NORTHWOODS BANK
JOSHUA GRAN	COMMUNITY BANK