PPG Industries, Inc.
One PPG Place Pittsburgh, Pennsylvania 15272

William H. Hernandez
Sr. Vice President, Finance

October 20, 2003

VIA E-MAIL

Lawrence W. Smith
Director, Technical Application & Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116
director@fasb.org

Letter of Comment No: 11
File Reference: 1025-200
Date Received: 10/20/03

Re: File Reference No. 1025-200

Dear Mr. Smith:

PPG Industries, Inc. (PPG) is pleased to submit its comments on the exposure draft, "Employers' Disclosures about Pensions and Other Postretirement Benefits." PPG is a Fortune 500 company and a leading global producer of coatings, glass and chemical products. The company employs approximately 33,000 employees, worldwide.

We agree with the Board that accounting for pensions and other postretirement benefits is a complex subject about which investors, analysts and other users of the financial statements are interested in understanding better. We believe the Board has, in this exposure draft, proposed an appropriate level of additional disclosures that will provide financial statement users with relevant information.

However, we do not agree with the proposed elimination of the FAS No. 132 requirement to provide the reconciliations of beginning and ending balances of the fair value of plan assets and benefit obligations in favor of a requirement to only provide disclosure of ending balances and key elements of the reconciliations as stated in Issue 8 of the exposure draft. The elimination of the current reconciliation requirement would create more confusion and less understanding of the pension and other postretirement benefits information. The reconciliations provide the "key elements" (benefit payments, contributions and actual return on plan assets), along with information on actuarial gain/loss, plan amendments and foreign currency translation in a logical format that establishes a more meaningful context for understanding than if a subset of the same information is presented in a disaggregated manner.

In order to provide transparent disclosures to our stakeholders, we maintain that the current disclosure requirement to provide reconciliations of the fair value of plan assets and benefit obligations should be retained.

Additionally, we agree that it is important to disclose information concerning the employer's expected contribution to the plan to be paid during the next year, as required by Issue 3b. However, we believe that this forward-looking information is more appropriately included in the liquidity section of Management's Discussion and Analysis rather than in the footnotes to the financial statements.

Thank you for the opportunity to express our views. Should you have any questions regarding our comments, please contact Kim Edvardsson, Director, Financial Accounting, at 412-434-3238.

Sincerely,

William N. Hemmerle es

cc: K. Edvardsson
D. B. Navikas