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From: Kampwerth, Ron

Sent: Friday, May 19, 2006 10:56 AM

To: 'director@fasb.org'

Cc: 'Andy Rochman'; Hoffman, Larry; Osborn, Dave

Subject: File Reference No. 1025-300, Employers Accounting for Defined Benefit Pensions and Other Postretirement Plans

Financial Accounting Standards Board
File Reference No. 1025-300

Dear Madams and Sirs:

This is a response to the Exposure Draft for the Employers Accounting for Defined Benefit Pensions and Other Postretirement Plans, an amendment of FASB Statements 87, 88, 106, and 132(R). We are only commenting on Issue 2, The Employer's Measurement Date.

The Board specifically asked "Are there any specific implementation issues associated with this requirement (plan measurement date same as employer's statement of financial position) that differ significantly from the issues that apply to other assets and liabilities that are recognized as of the date of the statement of financial position?"

We are a not-for-profit credit union that is small in terms of the overall financial institution arena; however, we do comply with all applicable FASB statements and pronouncements. In addition, we do utilize the current option for our defined benefit plan that allows the use of a measurement date to be no more than three months prior to our fiscal year end (9/30 measurement date with a 12/31 year end). In our plan there are currently less than 300 plan participants, minimal assumption and other changes from year to year, and investments that are typically in stable assets with minimal market fluctuations.

The only asset or other liability that requires third party involvement in the Credit Union's financial statement is the asset for the prepaid benefit cost associated with our defined benefit plan. This asset is calculated by an actuary. All of our other assets and liabilities valuations are readily available and are either noncomplex or immaterial to the overall financial position of the Credit Union. Therefore, to answer your above stated question, there are specific implementation issues associated with this change that differs significantly from other assets and liabilities that we have. First, it would delay our year-end financial reporting. We are currently able to complete our year-end accounting timely by using a 9/30 measurement date which allows us to complete the regulatory call reporting by the due date. If a 12/31 year end measurement date is required, all related information and reviews (which could include several levels) would need to be compiled and completed with in a short period of time.

This could put a strain on all parties involved coupled with all the other year-end reporting and accounting that the Credit Union needs to complete and which cannot be performed at an earlier date. Second, it would increase our pension costs related to actuarial, accounting and administrative costs in producing disclosures within a short time period. The cost would increase as small companies would now compete with larger companies to get this information when needed. We chose this option in the past to avoid the December 31st year end for which so many entities use. Third, it would not significantly affect the other asset value or disclosures as reported on the statement of financial positions or footnotes. This is due to the composition of the plan assets and the minimal plan changes.

For these reasons, we are asking for the Board to consider an exemption for small entities or small plans. This exemption could be based on asset size and/or number of plan participants. Consideration can also be given to small entities that are already using the option of having a different measurement date compared to fiscal year end date for financial reporting.

Sincerely,

Ron Kampwerth
VP, Internal Audit
Anheuser-Busch Employees' Credit Union