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May 31, 2006

Technical Director  
Financial Accounting Standards Board  
401 Merritt 7  
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LETTER OF COMMENT NO. 156

VIA E-MAIL: [director@fasb.org](mailto:director@fasb.org)

**Re: File Reference No. 1025-300. Proposed Statement of Financial Accounting Standards – Employers' Accounting for Defined Benefit Pension and Other Postretirement Plans, An Amendment of FASB Statements No. 87, 88, 106 and 132(R)**

Dear FASB:

The American Society of Pension Professionals & Actuaries (ASPPA) applauds the Financial Accounting Standards Board (FASB) on its decision to pursue a thorough reconsideration of pension and other postretirement benefit (OPEB) accounting through amendments to FASB Statements No. 87, 88, 106 and 132(R).

ASPPA is a national society of retirement plan professionals dedicated to a strong national retirement plan system. Its membership consists of nearly 6,000 actuaries, plan administrators, attorneys, CPAs and other retirement plan experts who design, implement and maintain qualified retirement plans covering tens of millions of American workers.

ASPPA agrees with the substance of the two comment letters submitted today on behalf of the American Academy of Actuaries (Academy) regarding FASB's proposed changes to the pension and OPEB accounting rules. The Academy furnished ASPPA a draft of its comments so as to involve ASPPA in the discussion surrounding the Academy's comments and assess whether a separate set of comments from ASPPA would be appropriate. ASPPA has determined that the positions taken in the Academy's letter are aligned with ASPPA's positions. ASPPA is thereby submitting this letter today to ratify the Academy's comments on behalf of ASPPA's members and to underscore the existence of a unified position related to this issue on behalf of the actuarial profession.

If you have any further questions, please contact Charles N. McLeod, FSPA, MAAA, FCA, EA, Chair, of ASPPA's Actuarial Issues Committee, at 713.266.7019 or [cnm@naps-inc.com](mailto:cnm@naps-inc.com).

Sincerely,

Sarah E. Simoneaux, CPC  
President

cc: Peter Perkins, President, American Academy of Actuaries  
Donald Segal, Vice President, Pension Practice Council, American Academy of Actuaries  
Heather Jerbi, Senior Policy Analyst, American Academy of Actuaries