May 1, 2008



Mr. Russell G. Golden
Director of Technical Application and Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

Re: Proposed FSP FAS 132(R)-a

Dear Sir:

We are pleased to respond to the proposed FASB Staff Position which would amend FASB Statement No. 132 (revised 2003), "Employers" Disclosure about Pensions and Other Postretirement Benefits" (FSP).

Abbott is a \$26 billion worldwide company engaged in the discovery, development, manufacture and sale of human health care products. Abbott sponsors defined benefit and retiree medical plans for substantially all domestic employees and for a significant number of international employees. As of December 31, 2007, the projected benefit obligations and accumulated post-employment benefit obligations for these plans were \$7.3 billion and plan assets amounted to \$6.0 billion.

We have reviewed the FSP and have the following comments:

For multinational companies with significant pension investments outside of the United States, accumulating the data required by this FSP on a timely basis will be difficult. Accumulating, summarizing and auditing this information will take more time than for any other current disclosure requirement. This would be especially true for investments of non-U.S. plans since the foreign trustees would likely not be familiar with the measurement requirements of FASB No. 157 and other U.S. GAAP requirements. In addition. Abbott's non-U.S. pension plan investments are not centrally managed thus adding to the complexity of accumulating the data. Adding to the delay would be that the search for cross concentrations could not be performed until all of the investment data has been accumulated. For Abbott, the proposed requirements of this FSP will likely result in an additional audit committee meeting since this footnote could not be completed in time for the normal meeting. We suggest that the disclosure requirements be allowed to be presented for a measurement period within three months of yearend as long as the data would be representative of what the year-end data would look like. This would give companies the time necessary to gather, analyze and summarize the disclosure information proposed by the FSP. Since pension plan investment portfolios are not actively traded, we believe this is a fair accommodation.

In addition, we believe that the requirement to provide a reconciliation of the beginning and ending investment balances measured using significant unobservable inputs does not provide the reader with meaningful information. We suggest that this requirement be replaced with additional disclosure about the nature of the assets included in this category that would give the reader information to judge the risk of mismeasurement of these investments.

Sincerely,

GWL/kaa