



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

LETTER OF COMMENT NO. 157

William H. Hernandez
Sr. Vice President, Finance

August 8, 2008

VIA E-MAIL

Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116
director@fasb.org

Re: File Reference 1600-100

Dear Sir or Madam:

PPG Industries, Inc. ("PPG") is pleased to submit its comments on the exposure draft of the proposed Statement of Financial Accounting Standards on Disclosure of Certain Loss Contingencies, an amendment of FASB Statements No. 5 and 141(R). PPG is a Fortune 500 company and a global supplier of coatings, chemicals, optical products, specialty materials, glass and fiber glass. PPG has more than 150 manufacturing facilities and operates in more than 60 countries.

We strongly disagree with most of the revisions to the disclosure requirements for loss contingencies proposed in this exposure draft. FASB Statement No. 5, Accounting for Contingencies was issued thirty-three years ago. It is an accounting standard that has broad applicability to many companies and its requirements are well understood by financial statement preparers, and users alike. We do not believe that any revision to the disclosure requirements of FASB Statement No. 5 is needed and we do not support the revisions proposed in this exposure draft.

Our biggest concern relates to the proposal that management should be required to disclose its best estimate of the maximum possible exposure to loss when it is reasonably possible that a loss has been incurred and no amount has been claimed or demanded. Major American corporations are each managing hundreds or thousands of contingent liability issues at all times, including litigation, environmental remediation, product liability claims, warranties and uncollectible receivables. Please keep in mind that we live in the most litigious society on the planet Earth. Litigation contingencies are often the most complex. Many lawsuits are filed with no amount of damages claimed. The amount of management time that would be required to think about every lawsuit in this category every quarter to develop an estimate of the maximum exposure to loss would be enormous. It is hard to even fathom how such an estimate would be developed when no amount of damages has been claimed. In many cases, the amount

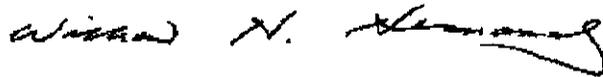
would best be described as a guess. I seriously doubt making such estimates would be possible if the desired outcome is to produce a meaningful result.

Our second major concern is that, even if we could estimate "maximum exposure to loss," we cannot comprehend how it would be in the best interest of our shareholders to publicly disclose those amounts. These contingent liabilities often arise from adversarial situations. If my adversary has not told me what he thinks his claim against me is worth, why would I communicate to him the maximum amount I believe it is reasonably possible that I would pay him?

The amendments you have proposed to the disclosure requirements of certain contingencies are seriously flawed. This exposure draft should be withdrawn. The disclosure requirements of SFAS No. 5 do not need to be modified.

Thank you for the opportunity to express our comments. Should you have any questions regarding our comments, please contact David Navikas, Vice President and Controller at 412-434-3812.

Sincerely,



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cc: David Navikas
Brian Williams