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October 20, 2010

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

Re: File Reference No. 1860-100

## Dear Technical Director:

I am writing on behalf of Indiana Construction Association (ICA), the leading statewide construction trade association representing commercial building, highway, heavy and utility contractors throughout Indiana. On behalf of our nearly 300 member companies, ICA would like to comment on the FASB's proposed Accounting Standards Update on Compensation—Retirement Benefits—Multiemployer Plans (Subtopic 715-80): Disclosure about an Employer's Participation in a Multiemployer Plan. We do not support the proposed changes and have several reasons for this position.

- 1. We feel that disclosing an unfunded withdrawal liability is misleading to the users of the financial statements when the organization does not intend to withdraw from the pension plan. Liabilities generally are not recognized unless they are both probable and can be estimated. Furthermore, the liability assessment would rely on actuarial calculations that are based on assumptions made by the plan's trustees. This liability would most certainly confuse the user of the statements and could cause sureties and lenders to question perfectly solvent companies.
- The cost to assess the unfunded withdrawal liability would be onerous to the contractor. Many of our contractors are participants in several multiemployer plans and would be burdened by significant expenses to account for an event that is highly unlikely to occur.
- 3. Preparation of financial statements could be delayed while waiting to obtain the actuary's computations for the withdrawal liability. Oftentimes, several months lapse before actuarial reports are available. This would cause the data to be outdated and unreliable and could negatively impact relationships with customers, vendors and service providers.

We strongly oppose the proposed disclosure and feel that it would have a negative impact on our contractors. It seems both unnecessary and quite costly and most probably would confuse many users of the financial statements.

Respectfully submitted,

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Charles V. Kahl President

