From:
 Steve Chesley

 To:
 Director - FASB

 Cc:
 Lake Coulson

Subject: Comments Regarding Proposes Rule 715-80

Date: Thursday, October 28, 2010 5:18:50 PM

As a trade association representing the electrical construction industry in eastern Iowa and western Illinois we would like to offer our comments regarding proposed Rule 715-80.

The contractors we represent contribute to a multi-employer defined benefit plan and we believe the proposed rule which would require these employers to list their withdrawal liability on their financial statements, would provide misleading and inaccurate information to users of these financial statements.

First of all, in my 24 years in the industry I have never seen withdrawal liability assessed on a contractor. It is extremely rare since the only time it would be assessed is if the employer tried to convert their business from a union to a nonunion entity. If the employer goes out of business, sells the business, or passes the business on to a heir, their is no withdrawal liability.

In addition, determining withdrawal liability in the multi-employer construction industry is almost impossible for the following reasons:

- 1. The industry's workforce is very transient and always changing;
- 2. The withdrawal liability changes constantly depending on market returns, amount of contributions into the funds, and amount of hours worked in the industry, so that a "snapshot" of an employer's withdrawal liability will always be inaccurate:
- 3. The withdrawal liability will increase for employers when they have competitors go out of business and will decrease as more employers enter the business:
- 4. The only time a withdrawal liability exists is if a defined benefit plan is underfunded.

Having this very improbable and inaccurate withdrawal liability listed on an employers financial statement will negatively impact their ability to secure lines of credit, secure loans, obtain bonding and will make it more difficult to sell their business.

We understand FASB's role in trying to provide accurate information to end users to assist them in making informed decisions but we believe that disclosing withdrawal liability on financial statements is misleading and inaccurate information that will only create administrative burdens for financially sound companies and could jeopardize their ability to secure loans, lines of credit and bonds.

We thank you for reading and considering our comments.

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