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VIA E-MAIL to director@fasb.org

April 14, 2006

Lawrence Smith
Director Technical Application & Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
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Letter of Comment No: 12
File Reference: 1025-300

File Reference No. 1025-300 -Employers' Accounting for Defined Benefit Pension and Other Post Retirement Plan, an amendment of FASB Stmts. No. 87, 88, 106 and 132(R)

Dear Mr. Smith:

Trinity Health would like to comment on the March 31, 2006 exposure draft of the proposed statement of financial accounting standards "Employers' Accounting for Defined Benefit Pension and Other Post Retirement Plans, an amendment of FASB Stmts. No. 87, 88, 106 and 132(R)", (the "exposure draft").

We support the Board's efforts to improve existing reporting for defined benefit post retirement plans. While we agree that many of the proposed changes in the exposure draft will enhance information provided within the balance sheet and statements of operations and changes in net assets without the necessity to review information contained in footnotes to the financial statements, we do not agree with the proposal to change the measurement date for plan assets and benefit obligations to the date of the employer's balance sheet. We wish to respond to Issue 2 outlined in the exposure draft as follows:

> "Unless a plan is sponsored by a subsidiary that is consolidated using a fiscal period that differs from the parent's this proposed statement would require that plan assets and benefit obligations be measured as of the date of the employer's statement of financial position. This proposed statement would eliminate the provisions of Statements 87 and 106 that permit measurement as of a date that is not more than three months earlier than the date of the employer's statement of financial position.
>
> Are there any specific implementation issues associated with this requirement that differ significantly from the issues that apply to other assets and liabilities that are recognized as of the date of the statement of financial position?"

Trinity Health believes the provisions of Statements 87 and 106 that permit measurement as of a date that is not more than three months earlier than the date of the employer's statement of financial position should be retained in this statement. In order to efficiently receive actuarial valuation reports on a timely basis and to record within the financial statements the items that impact the funded status of a defined benefit postretirement plan as outlined in the exposure draft the additional time is needed. Trinity Health currently utilizes a measurement date three months prior to our balance sheet date. Changing the measurement date to the employer's balance sheet date will put an unreasonable burden on actuaries to report data on a timely basis and will create a burden on employers who will now need to wait to obtain actuary reports and record data that was previously only required for footnote disclosure within the financial statements.

Trinity Health has multiple plans and multiple valuation reports for both defined benefit pension and other post retirement plans. Many of the plans are controlled by and recorded within the financial statements of consolidated subsidiaries. Thus receipt of these valuation reports on a timely basis will be a critical part of our year-end close process now that much of the information will be recorded within the financial statements. Trinity Health considers accounting policies and procedures for our defined benefit pension and post retirement plans to be critical accounting policies due to the significant judgments and estimates involved in the actuarial valuation process. Considerable time is spent reviewing and understanding the results of the valuation reports. This review process will also be delayed into an employer's peak year-end close process if the measurement date must equal the employer's balance sheet date.

In addition, Trinity Health has a large portion of plan assets invested in securities that are not marketable equity securities with readily determinable fair market values. The valuation of these investments often lags 45 days subsequent to the reporting period end. Estimating these values is not practical as large swings in values can occur on a monthly basis. Thus Trinity Health will need to wait until 45 days after our balance sheet date to obtain final plan asset values that can then be utilized by our actuaries for preparing final valuation reports. The exposure draft indicates in paragraph B39 that "discount rates and measurements for most plan assets should not be prepared as of an earlier date and projected forward".

The Board could consider requiring that significant changes in plan assets or benefit obligations that arise after the measurement date but before the fiscal year end to be recognized or disclosed during the current fiscal year based on the event date if the event is material, similar to procedures followed for a subsequent event.

The additional footnote disclosure required to reconcile the employer's statement of financial position as of the reporting date to the plan's measurement date is not a large burden on the employer. This procedure is already in place for employer's whose measurement date differs from the balance sheet date.

We appreciate the opportunity to provide comments on this exposure draft. We can be reached at 248.489.6060 if there are questions on our comments.

Sincerely,

Edward Chadwick
Chief Financial Officer & SVP

Kimberly McCarthy
Director, Financial Reporting

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