

Stacey Sutay

Subject: FW: File Reference No. 1025-200

Letter of Comment No: 16
File Reference: 1025-200
Date Received: 10/22/03

-----Original Message-----

From: Cassidy, Colin [mailto:CassidC@divinvest.com]
Sent: Wednesday, October 22, 2003 4:05 PM
To: Director - FASB
Subject: File Reference No. 1025-200

Dear Sirs,

In regards to the schedule of estimated future benefit payments, the statement seems to propose that the benefits shown would, when discounted, equal the benefit obligation. In other words, the benefits shown would be based on service to date but not any future service. This is not a stream of benefit payments typically captured by actuaries in doing their valuation work. Usually projected benefit payments would include additional service.

Perhaps the schedule of estimated future benefit payments could include the impact of future service. The total of undiscounted payments would, when discounted, equal the present value of future benefits for DB plans and the EPBO for postretirement medical plans. In the illustration, a line could be added under "total undiscounted payments", "less the effect of future service", then "less discount for interest" to arrive at the benefit obligation.

Colin B. Cassidy
Consulting Actuary
Diversified Actuarial Services, Inc.
275 Grove Street
Suite 2-300
Newton, MA 02466
Phone(617) 965-1200
FAX (617) 244-5569

CONFIDENTIALITY NOTICE

This transmission is intended for the sole use of the individual and/or entity to whom it is addressed, and may contain information and/or attachments that are privileged, confidential and exempt from disclosure under applicable law. If the reader of this transmission is not the intended recipient, you are hereby notified that any disclosure, dissemination, distribution, duplication or the taking of any action in reliance on the contents of this transmission by someone other than the intended addressee or its designated agent is strictly prohibited. If your receipt of this transmission is in error, please notify the sender by replying immediately to this transmission and destroy the transmission. Thank you.
(DMZIM01)