

NATIONAL COORDINATING COMMITTEE FOR MULTIEmployER PLANS

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Letter of Comment No: 19
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Mr. Lawrence Smith
Director of Technical Application and Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116
By email: director@fasb.org

Re: File Reference No. 1025-200

Dear Mr. Smith,

The National Coordinating Committee for Multiemployer Plans (the NCCMP) is pleased to submit this comment on the Financial Accounting Standards Board's Exposure Draft on Employers' Disclosures about Pensions and Other Postretirement Benefits, which would amend FASB Statements No. 87, 88 and 106 and replace Statement No. 132.

The NCCMP is the only national organization devoted exclusively to protecting the interests of the approximately ten million workers, retirees, and their families who rely on multiemployer plans for retirement, health and other benefits. Multiemployer plans provide benefits for employees of two or more employers, pursuant to collective bargaining agreements. The purpose of the NCCMP is to assure an environment in which multiemployer plans can continue their vital role in providing benefits to working men and women. The NCCMP is a nonprofit organization, with member plans and plan sponsors in every major segment of the multiemployer plan universe.

In revisiting the issues covered by FAS No. 87, 88 and 106, the FASB considered expanding the types and particularity of information that contributing employers would be required to disclose regarding any multiemployer plans to which they contribute, but decided not to do so (Issue 9j). The Board concluded that the costs associated with assembling the kind of information under consideration would outweigh its usefulness. Accordingly, the Exposure Draft would not change the employer disclosures associated with multiemployer pension and health plans.

The NCCMP agrees with this conclusion. The nature of employers' obligations with respect to multiemployer plans has not changed since those earlier Statements were adopted, nor has reliable, readily comparable data regarding those plans become more readily accessible. Any benefit that financial statement users might think they would gain from increased employer

disclosure regarding multiemployer plans would likely be dwarfed by the confusion and misunderstanding that would be stirred up by employers' efforts to obtain the information and condense it for presentation. As you have already recognized, this game would not be worth the candle.

Please feel free to call us if you have any questions on this issue. I can be reached at (202) 756-4644, or by e-mail at rdefrehn@nccmp.org.

Sincerely,

Randy G. DeFrehn

Randy G. DeFrehn
Executive Director