From: <u>Bill Rhodes</u>
To: <u>Director - FASB</u>

Subject: File reference No. 1840-100

Date: Wednesday, September 08, 2010 5:12:47 PM

I have researched your proposed changes in the recording of "possible" withdrawal liability numbers for employers contributing to multiemployer pension plans. Certainly you understand that if the employer continues to work in the industry in the same geographic area, he will never have a withdrawal liability. With such, it is quite ridiculous that your organization would require the employer to recognize a liability that "could" become an actual liability.

This is tantamount to my thinking of spending \$1 million on something during December 2010 and then still not having made any firm decision, at year end, I would have to record the possible expenditure of \$1 million because I thought about possibly doing so even though I did not spend the money.

I strongly request that you reconsider your proposal to force employers to include a "maybe" liability on their financial statement. If this is your position, what is next?

William A. Rhodes, Jr.

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