

PPG Industries, Inc. One PPG Place Pittsburgh, Pennsylvania 15272

Robert J. Dellinger Sr. Vice President, Finance and Chief Financial Officer

September 20, 2010

VIA E-MAIL

Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116
director@fasb.org

Re: File Reference 1840-100

Dear Technical Director:

PPG Industries, Inc. ("PPG") is pleased to submit its comments on the Financial Accounting Standards Board's ("FASB") exposure draft of the Proposed Accounting Standards Update on Disclosure of Certain Loss Contingencies (Topic 450) (the "Proposed ASU"). PPG is a Fortune 500 company and a global supplier of coatings, chemicals, optical products, specialty materials, glass and fiber glass. PPG has more than 120 manufacturing facilities and operates in more than 60 countries.

We believe that ASC Topic 450 (formerly FAS No. 5) has been a good accounting standard. It has dealt with a significant, complex accounting issue with simple and straightforward guidance. In many respects, the disclosures required by this Proposed ASU are not substantively different than the disclosures required currently by ASC Topic 450 (formerly FAS No. 5). If the current view is that disclosures about contingencies are generally not adequate, is it really necessary to issue new disclosure guidance? Why not provide input to financial statement preparers that improvement is needed in applying the current disclosure guidance concerning contingencies? The Proposed ASU can be viewed as a step toward the micro management of accounting and reporting standards. This is unfortunate and a reinforcement of the rules-based approach of US accounting standard setting. The Proposed ASU is not consistent with a principles-based approach to standard setting.

We believe that the Proposed ASU is an improvement compared with the 2008 exposure draft Disclosure of Certain Loss Contingencies-an amendment of FASB Statements No. 5 and 141(R) because the proposed requirements in the 2008 exposure draft to disclose information that was predictive in nature have been removed. We appreciate the FASB's willingness to listen to the concerns of its stakeholders and to modify its proposals when appropriate. We would rather you take a new approach and advise financial statement preparers to improve their disclosures under the current

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guidance, but if you move forward to issue this Proposed ASU then we have several specific comments to make.

Update of the agreement between the legal and auditing professions

We understand that the new disclosure requirements of the Proposed ASU are not considered in the current "treaty" between the legal and auditing professions that was reached at the time FAS No. 5 was issued. Many of the assertions that management makes regarding legal matters are only supportable by the letters that are provided by legal counsel. Although we understand that the FASB intends to work with the Public Company Accounting Oversight Board, the American Institute of Certified Public Accountants and the American Bar Association to identify and address any potential operational issues of a new standard under the existing treaty and current practice as it relates to the content of audit-response letters provided by attorneys. However, we believe the Board should resolve these operational issues prior to the issuance of a final standard because an impasse between the lawyers and accountants could result in delays in issuing audited financial statements or modifications of auditors' opinions.

Prejudicial exemption

We appreciate that the FASB has eliminated many of the disclosure requirements included in the prior exposure draft that would have directly resulted in disclosure of prejudicial information; however, the Proposed ASU still contains disclosure requirements that may result in disclosure of information that could prejudice companies in ongoing litigation and may increase their litigation exposure. For example, the level of disaggregation required in the tabular reconciliation and disclosure of the potential magnitude of loss related to a contingency may result in the disclosure of prejudicial information, particularly if the company has a limited number of contingencies in total. These disclosures may harm the company's litigation position by disclosing the company's perception of the strength of the plaintiff's case. Certain disclosures could compromise a company's ability to defend itself in litigation and potentially reduce its negotiating position. Accordingly, we believe it is essential that the Board include a specific exemption from having to disclose prejudicial information in the final standard ensuring a solid basis for management to be flexible in crafting meaningful, yet non-prejudicial, disclosures about loss contingencies.

Effective date

The Proposed ASU has an effective date of fiscal years ending after December 15, 2010. We believe this date is unrealistic given the likely timing of the issuance of the Proposed ASU. Should the FASB adopt the Proposed ASU, companies will be required to re-evaluate their data gathering process concerning contingencies and take other steps to ensure compliance with the new disclosure requirements. We recommend that the Proposed ASU be effective for fiscal periods ending after December 15, 2011 to allow preparers sufficient time to implement the requirements and to allow the auditing and legal professions time to reach a new agreement.

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Thank you for the opportunity to express our comments. Should you have any questions regarding these, please contact David Navikas, Vice President and Controller at 412-434-3812.

Sincerely,