

From: [Alan Orosz](#)
To: [Director - FASB](#)
Date: Wednesday, October 20, 2010 11:19:08 AM
Attachments: [File Reference 1840-100.pdf](#)



October 19, 2010

Mr. Russell Golden, Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

VIA: E-Mail director@FASB.ORG

RE: File Reference #1840-100
Disclosure of Certain Loss Contingencies

I appreciate the opportunity to provide comments to the proposed amendments for certain loss contingencies from withdrawal from a multi employer defined benefit pension plan.

IHC Construction Companies, LLC, is opposed to the changes for the following reasons:

We are a construction company servicing the Chicago area and surrounding counties. We are signatory to a collective bargaining agreement which provides for retirement benefits from a defined benefit pension plan.

We strongly believe any changes made to the reporting standard should only apply to a company that has decided to withdraw from such a plan. Changing the reporting standards for the thousands of companies who have no intention of withdrawing from such a plan would result in a negative outlook and potentially misinformation on one's financial statement.

The unreliability of the information you are requesting, I believe will negatively impact companies who have no intention of going out of business or withdrawing from their current collective bargaining agreement.

Specifically, these changes would impact a company's potential net worth, have a negative effect on a contractor's bonding capability, have an adverse effect on investors wishing to purchase a company signatory to a collective bargaining agreement, etc.

I respectfully submit that the proposed changes are hypothetical in nature, and I see no positive results arising from the proposed changes, and therefore we strongly suggest you withdraw the proposed amendment change.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan L. Orosz", is written over a horizontal line.

Alan L. Orosz
Chief Financial Officer
IHC Construction Companies, LLC.

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