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October 22, 2010

Mr. Russell G. Golden, FASB Technical Director 401 Merritt 7 PO Box 5116 Norwalk, CT 06856-5116

RE: FASB's Exposure Draft, File Reference 1860-100, Multi-employer plan disclosure

Dear Mr. Golden:

As background; for thirty-two years, my enterprise has featured employment within the multi-employer plan arena and for the last sixteen of those years I have represented management as a pension and health fund trustee. The edification garnered in these positions provides standing for responding to your invitation to offer comment.

Our firm employs personnel of four different disciplines within the context and parameters of "multi-employer" plans, and many of the proposed FASB changes, albeit well meaning, are onerous, costly, and potentially misleading, especially to the uninitiated.

Thus, and with featured brevity, kindly consider:

- Multi-employer funds are already required to report their financial status and inclusion of these mandated reports alone could serve the same purpose.
 - Even this may not be workable as reports may not be rendered as timely to the business fiscal year-end financial reports
- Within the financial reporting realm, a valid withdrawal liability would prove disingenuous
 - A reporting of each plan will require payment for lengthy footnotes that in reality serve little purpose.
 - O While the risk is notionally real but highly unlikely and speculative
 - Financial footnotes can convolute the realities of the matter they are trying to relate
- Were a value benefit analysis conducted for the annual costs incurred to determine each of the several discipline's withdrawal liability, I posit the results would be insignificant, at best.
- After funding such a mandate, the result will be much ado about nothing.

I appreciate the aspiration to increase plan disclosure but consideration for the issues

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confronting their implementation, especially as applicable to multi-employer plans, is necessary. As featured by FASB, the reporting will be a burden without real time benefit to the multi-employer plans with real assets, not just a balance sheet liability entry!

We appreciate the opportunity provided to offer commentary and trust you will consider that proffered within the context that understanding is not always experiential.

Respectfully submitted,

Stanley Thompson, Jr. President

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