

From: [Rich Wynne](#)
To: [Director - FASB](#)
Subject: FASB File Reference No. 1860-100
Date: Wednesday, October 27, 2010 7:23:21 PM

Dear Sir or Madam:

As the executive director of the St. Paul Chapter of the National Electrical Contractors Association, I represent over 150 electrical contractors who contribute to multi-employer defined-benefit pension plans on behalf of their employees.

I am very concerned about the effect the provisions of the above-referenced file (FASB 715-80) will have on the contractors. While the need for greater transparency with respect to financial decision-making by crediting institutions is understandable, I am concerned that FASB's request for additional disclosures will produce misleading and inaccurate information, as most withdrawal liability estimates will be more than a year out of date when financial statements are published.

The contractors I represent have mobile workforces, as is common in the construction industry. Any given retired electrician may have worked for many, many employers during the course of his or her career, so how does one of those employers consider him or her to have retired from that employer's company? How can a given employer accurately list the number of retired workers he or she has employed? Even if the employer could come up with an accurate list, given other provisions of the law with respect to withdrawal liability as passed by Congress to strengthen multi-employer defined-benefit pension plans, such as mandating up-front payments when a plan is deemed to be in critical status, it is very unlikely that an employer would end up having to cover the full withdrawal liability assessment.

The contractors will be unduly burdened by the paperwork and costs involved in having their own withdrawal liability calculated by an actuary, the costs of which are far from minimal. (Are there even enough actuaries to deal with the additional need for information?) Furthermore, it is very unlikely for the vast majority of the employers that a decision will be made to withdraw from the bargaining unit, thereby incurring withdrawal liability.

So, with all due respect, given the rules that are already in place to strengthen defined-benefit pension plans, I urge you to reconsider your position on this matter. The rules FASB proposes will result in unreasonable burdens to the employers with questionable, and potentially very harmful, results.

Sincerely,
Richard J Wynne

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