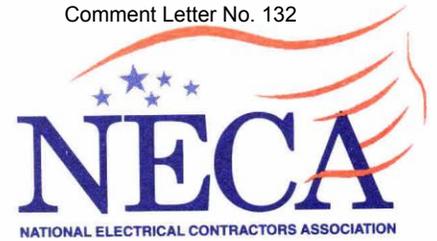


SOUTHWEST WASHINGTON CHAPTER

**NATIONAL  
ELECTRICAL  
CONTRACTORS  
ASSOCIATION**



October 28, 2010

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

Re: File Reference No. 1860-100

Dear Mr. Golden:

I am writing on behalf of the 36 Electrical Contractor Members of the Southwest Washington Chapter N.E.C.A., in regards to our extreme opposition to F.A.S.B.'s new proposed disclosure requirements Topics 715-80 "Exposure Draft on Compensation Retirement Benefits-Multiemployer Plans" and Topic 450 "Disclosure of Certain Loss Contingencies".

Our Southwest Washington Employers understand the F.A.S.B.'s intent for true transparency with these new proposed disclosures. We are very supportive of transparency as long as it equitable, relevant, accurate, and necessary which we believe neither of these two proposals is.

The proposed disclosures for "Withdraw Liability" are not only misleading, they are also incredibly inaccurate. Any "Withdraw Liability" amount calculated by a Pension's Plan Actuary is simply a snapshot of a single moment in time and fails to reflect the long-term nature of multiemployer defined benefit plans or other factors affecting plan funding such as fluctuating stock market returns. A Company's "Withdraw Liability" amount is a moving target that changes day to day. It is nearly impossible to accurately estimate a Company's liability figure until the exact day a Company would choose to go Non-Union. Even on that date the "Withdraw Liability" amount is still an inaccurate figure due to the fact that the Company is allowed to pay the liability over a 20 year payment schedule based on a maximum annual liability which is guaranteed not to equal the original "Withdraw Amount".

In the Fifty Three year history of the Southwest Washington Chapter N.E.C.A. not a single employer has even had to pay a penny of "Withdraw Liability". **We believe that F.A.S.B. is potentially ignoring existing congressional ERISA statute, and should only be concerned if an employer has incurred or will likely incur withdrawal liability, then and only then should it be required to report such an assessment on its financial statements.** It is incredibly unlikely and rare that an employer would ever cease contributing to a defined benefit plan and actually incur withdrawal liability.

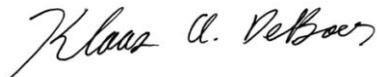
There is an enormous expense and administrated burden created by implementation of these proposed disclosures. The employers of our chapter are signatory to a minimum of two Pension Funds. The National Electric Benefit Fund (NEBF) which currently charges \$1,200 to calculate a company's "Withdraw Liability", and the Pacific Coast Pension Fund (PCPF) that charges \$900 and plans to raise that fee if these proposals passed. That is a minimum annual cost to our employers of \$2,100. Most of the employers in our area work in multiple pension jurisdictions and would be forced to waste precious amounts of time and to pay absurd fees to calculate worthless figures.

The ability for the employers in my area to perform electrical construction is necessitated by securing banking lines of credit and bonding projects. Forcing employers to disclose fictitious "Withdraw Liability" numbers will only confuse Banking Lenders and Bonding Companies that don't understand what these figures mean and when they are even applicable. This will further complicate an already difficult leading market. Companies will not be able to secure lines of credit and bond work, and Lenders and Bonding companies will lose out on a tremendous amount of business from noteworthy clients.

F.A.S.B.'s proposed disclosures (Topic 715-70, Topic 450) will seriously jeopardize the future of 101 union employers that employ 1,200 electricians in our jurisdiction alone, and will have the same impact on other employers participating in multi-employer pension plans around the country. To put the unnecessary burdens on employers in these crippling economic times would be catastrophic. I ask the members of the F.A.S.B. to step back and take a real look at the impact of these disclosures will have on thousands of hard working American families across the country.

In closing, I encourage the members of F.A.S.B. to reconsider these proposed disclosures. Please ask the members at what cost are they willing to put forth these inequitable, irrelevant, inaccurate, and unnecessary Financial Rules.

Respectfully,



Klaas A. DeBoer,  
Executive Manager  
Southwest Washington Chapter N.E.C.A.