

# BRICKLEY DELONG

CERTIFIED PUBLIC ACCOUNTANTS

October 25, 2010

Technical Director, FASB  
401 Merritt 7  
PO Box 5116  
Norwalk, CT 06856-5116

Re: File Reference No. 1860-100  
Disclosure about an Employer's Participation in a Multiemployer Plan  
(Subtopic 715-80)

Dear Sir or Madam:

We appreciate the opportunity to comment on the exposure draft regarding the Disclosure about an Employer's Participation in a Multiemployer Plan. Brickley DeLong, PC is a certified public accounting firm that provides auditing services to multiemployer pension plans and contractors that contribute to these plans.

While we understand the desire for greater transparency in financial reporting, we believe the currently proposed changes to the financial statement disclosures for employers participating in multiemployer pension plans may result in misleading information to the user of the financial statements as well as additional costs to both multiemployer pension plans and participating employers.

We concur that if an employer expects to or is in the process of withdrawal from a multiemployer plan, the potential withdrawal liability should be disclosed. The current accounting standards already require this. The concern surrounds the effect on employers participating in a plan that have no intent to withdraw from the plan. In this case, the amount of the potential withdrawal liability is irrelevant. Current accounting standards indicate that if the likelihood of a contingency is remote, there is no disclosure requirement. Under the circumstances as described above, this is a reasonable method.

It seems that this disclosure could create confusion for financial statement users and possible issues for participating employers as they attempt to obtain financing or bonding necessary to stay in business. In addition, the expense to comply with the proposed changes would cause an unnecessary burden on both the multiemployer plans and the participating employers due to the significant time involved in the numerous calculations that would be required as well as the administrative time fielding requests for information. Finally, the timing of issuance of financial statements for employers is typically much sooner than that of multiemployer plans. Therefore, the employers would either need to delay issuance of their statements or use information from the prior plan year, which ultimately could be out of date and unreliable.

In conclusion, we request that FASB consider removing the proposed requirement for all employers to disclose the potential withdrawal liability from a multiemployer pension plan in the financial statement.

Thank you for the opportunity to respond on behalf of our clients.

Sincerely,



Brenda K. Jacobs, CPA