



M. O'HERRON COMPANY

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November 1, 2010
via email: director@fasb.org
Technical Director
Financial Accounting Standards Board
301 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Re: File Reference No. 1860-100, Proposed Accounting Standards Update—Compensation—Retirement Benefits—Multiemployer Plans (Subtopic 715-80): *Disclosure about an Employer's Participation in a Multiemployer Plan*

Dear Sir or Madam:

On behalf of **M. O'Herron Co.**, I respectfully submit the following comments in response to the Exposure Draft, *Disclosure about an Employer's Participation in a Multiemployer Plan*. We appreciate the efforts of the Board and its staff in preparing the Exposure Draft and for the opportunity to comment on the proposed principles.

M. O'Herron Co. is a heavy and highway construction company specializing in the installation of gas pipeline utilities operating in western Pennsylvania. We contribute to FOUR multiemployer pension plans. Our company has 107 years experience serving the construction industry.

M. O'Herron Co.'s concerns about the Exposure Draft are extensive, and I would like to summarize our concerns briefly. For a more detailed explanation, we reference comments already submitted by two associations, one national and the other local, that our company belongs to: the Associated General Contractors of America (AGC) and the Constructors Association of Western Pennsylvania (CAWP).

We believe the draft under appreciates the costs associated with compliance and overestimates the relevancy of the information that would be provided if the Exposure Draft were to go into effect as written. We believe that any information included will be neither timely nor accurately reflective of the financial impact of participating in a multiemployer plan. We believe the Exposure Draft underestimates the complexity of the relationship between employers and multiemployer plans and significantly underestimates the importance of the construction industry exemption that makes almost any liability merely theoretical rather than material.

Based upon these facts, we strongly urge the Board to withdraw the current Exposure Draft for reconsideration and rewrite the proposal, taking into account the points and suggestions in our response. Due to the potentially negative economic impact of the proposal on employers who participate in multiemployer plans, we are concerned that the Exposure Draft, in its current form, would create undue hardships for employers that are already struggling to weather the economic recession.

Thank you for your consideration of our views.

