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RE: File Reference No. 1860-100

To Whom It May Concern:

The Massachusetts Bricklayers and Masons Pension Plan (the "Plan") appreciates the opportunity to provide comments regarding the Exposure Draft on Disclosures about an Employer's participation in a Multi-Employer Pension Plan. The Financial Accounting Standards Board (the "Board") published the Exposure Draft on September 1, 2010.

The Plan, originally established on April 1, 1959, is a Multi-Employer Defined Benefit Pension Plan covering members of the Union of Bricklayers and Allied Craftsmen throughout the State of Massachusetts who are employed by participating Employers. Over 200 participating Employers make contributions to the Pension Plan on behalf of their covered Employees. No participating Employers are public companies. The Plan currently has over 3800 active and inactive participants. With respect to withdrawal liability, the Plan is in the building and construction industry.

In Question 2, the Board asked: "Do you believe that disclosing the estimated amount of the withdrawal liability, even when the withdrawal is not at least reasonably possible, will provide users of financial statements with decision-useful information? Why or why not?"

We believe that disclosing the estimated amount of the withdrawal liability, especially when withdrawal is not at least reasonably possible, will not provide users of financial statements with decision-useful information. In fact, we believe it will penalize our contributing Employers by making their access to credit and insurances harder to obtain. By requiring the disclosure of this remotely possible liability the Board will force banks, surety companies and insurance companies to adjust their expectations of our Employer' cash flow because of the liability, which is very remote.

If an Employer does not withdraw from the Plan, an Employer does not incur withdrawal liability. In the building and construction industry, the Employee Retirement Income Security Act of 1974 ("ERISA") adds an additional requirement for a withdrawing Employer that triggers assessment of withdrawal liability. It is our experience that when one of our Employers leaves the Plan, this additional requirement is not triggered. If the Employer's business is good, it likely will sell the business to another Employer. If the business is so-so, there may not be a buyer so the business likely shuts its doors. If the business is not good, perhaps a bankruptcy filing is the Employer's only way out.

In our experience, in none of these situations does the Employer leaving the Plan continue in business as a non-union shop nor does the Employer resume business within 5 years as a non-union shop. Thus, it is our experience that none of our Employers ever triggers the additional requirement under ERISA for the Plan to be able to access withdrawal liability. Accordingly, requiring our Employers to disclose a liability they will never incur is to punish them unfairly.

In Question 3, the Board asked: "What implementation costs, if any, will an Employer face in applying the proposed disclosures?"

The Plan does not know the extent of the costs an Employer will incur in applying the proposed disclosures. From the Plan's perspective there will be an annual charge for the Plan to compute the Employer's withdrawal liability amount. Additionally, the Plan is not ready to be able to provide to all of

its over 200 Employers the level of detail the Board proposes. To become able to provide what the Board proposes will require the Plan to add administrative capability to be able to process participant and contribution data as the Board proposes. Because of ERISA's exclusive benefit rule the Plan cannot just provide this disclosure information to Employers without charging the Employers for it.

I hope you will give my comments the utmost consideration. Thank you once again for allowing me to participate in this very important process.

Sincerely yours,

Charles Raso, Secretary-Treasurer
Board of Trustees
Massachusetts Bricklayers and Masons Pension Fund