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October 20, 2010

Mr. Russell Golden Technical Director 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116

RE: File Reference #1840-100

Disclosure of Certain Loss Contingencies

Dear Mr. Golden:

I want to thank you in advance for listening to my concerns as it relates to the aforementioned topic. First, I want to let you know I have been involved in the Construction Business for over forty years and have been a Pension Trustee (Operators/MOE in Chicago) for the last twenty four years.

As an Owner of a construction business I oppose the new rule because it will put an unfair burden on all union contractors. Our non-union competition does not have the pension obligations that we have so they will gain a distinct advantage on us on the balance sheet. Second, I have no intention of withdrawing from our union affiliations around the US. Third, with over fifty union agreements currently in effect I would have to hire more staff just to handle this issue. Again my non-union counterparts do not have to do that.

As a Trustee I feel no need for this information to do my job. I think if we would spend our joint efforts on more pension reform we would be better off. Second, by the time our fund office would get the data to the contractors it would be old and useless. Third, we would have to hire more staff to handle the situation and presently we cannot afford those additional costs. Fourth, we would have to charge the contractors additional fees that could become unmanageable for both of us and again give our non-union competition a distinct advantage.

I think you get the idea that this effort by FASB is not going to benefit our Industry. Therefore, I oppose any effort to proceed. If you have any desire to discuss this matter further please feel free to call me at 847-541-8200.

Sincerely,

John E. Kenny, Jr.

President