

2265 Carlson Drive Northbrook, IL 60062 (847) 498-4800 1860-100 Comment Letter No. 326

F.E. Moran, Inc.

F.E. Moran, Inc. Mechanical Services F.E. Moran, Inc. Fire Protection North F.E. Moran, Inc. Fire Protection South

F.E. Moran, Inc. Special Hazard Systems
F.E. Moran, Inc. Alarm and Monitoring Services

Fire Protection Industries, Inc.

Armon, Inc.

November 12, 2010

Financial Accounting Standards Board 401 Merritt 7 PO Box 5116 Norwalk, CT 06856-5116

Attention: Technical Director

Re: File Reference No.: 1860-100

Proposed Disclosure of Potential Pension Withdrawal Liability

Dear Sirs and Madams:

The Moran Group is made up of multiple operating entities that perform mechanical and electrical work throughout the country. We are signatory to over 60 unions representing pipe fitters, sheet metal workers, sprinkler fitters, plumbers, electricians, and laborers. We have contributed to multi-employer pension plans on behalf of our employees since 1957.

We are opposed to FASB's proposal to require companies to report the full amount to be paid if withdrawal liability were incurred even though there is little or no chance that they would actually incur the liability. Today we are aware that many of the pension plans are underfunded so the potential liability, if reported, would erase our net worth. Our surety can not support our company without a strong net worth and without them, we would not be able to bid and perform work. It would make us noncompliant with the terms of our lender, threatening our ability to borrow. We cannot survive without the support of these financial institutions.

The additional burden that this exercise would cost us is material. To obtain an accounting of what our withdrawal liability is each year would cost us an estimated \$276,000 every year. The proposal would unfairly punish us for participating in multi-employer pension plans and rewarding those that do not.

I find it particularly ironic that our company was never required to report the significant repurchase obligation of our ESOP. This was a real, not potential, liability that ultimately was paid out to employees recently.

By contrast, this proposal will negatively impact the vast majority of construction industry employers who will never incur withdrawal liability.

Please reconsider this proposal and withdraw it completely.

Sincerely,

Brian Moran

cc: Mr. Ronald W. Lott - Research Director

Ms. Suzanne Q. Bielstein - Planning & Support

Mr. Leslie F. Seidman

Mr. Russel G. Golden

Mr. Thomas J. Linsmeier

Mr. Marc A. Siegel

Mr. Lawrence W. Smith