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URS

Reed N Brimhall, CPA
Vice President, Controller
and Chief Accounting Officer

August 5, 2008

LETTER OF COMMENT NO. 222

Mr. Robert H. Herz
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Re: FAS 5 Exposure Draft – File Reference No. 1600-100

Dear Sir or Madam:

URS Corporation, a Fortune 500 company, strongly disagrees with some of the proposed conclusions contained in your exposure draft, PROPOSED STATEMENT OF FINANCIAL ACCOUNTING STANDARDS, DISCLOSURE OF CERTAIN LOSS CONTINGENCIES, AN AMENDMENT OF FASB STATEMENTS NO. 5 AND 141(R) ("Proposed FAS 5 Requirement"), for the reasons described below:

Expanded waivers of privilege and/or our attorney client work product will occur as a result of the FAS 5 disclosure requirements.

The Proposed FAS 5 Requirement will require us to produce extensive and extremely speculative information about potential litigation losses, which will increase the risk of a waiver of privilege and/or our attorney client work product. Such additional disclosure will highlight our litigation assessments that previously were carefully guarded in adversarial proceedings, thus harming our long term business interests, and by extension, our value to shareholders. Furthermore, independent auditors will request more information in order to test our estimates, which will amplify the risk of a waiver of privilege and/or our attorney client work product.

Qualitative assessments of likely outcomes, timing and loss assumptions will negatively impact litigation negotiations.

The Proposed FAS 5 Requirement to provide qualitative assessments of likely outcomes, timing of the resolution and our assumptions on loss amounts will provide important proprietary details about our litigation and settlement strategies. Contrary to the FASB intent, it is possible, perhaps even likely, that our litigation counsel will become more reluctant to provide complete assessments and detailed contingency analyses, in order to avoid unnecessary disclosure or liability and to protect the strategy he or she has developed to protect the Company's interests.

URS Corporation
600 Montgomery Street, 26th Floor
San Francisco, CA 94111-2728
Tel: 415.774.2700
Direct: 415.774.2752
Fax: 415.981.6711
reed_brimhall@urscorp.com

It's possible that our SEC periodic report disclosures will be admissible evidence in future proceedings.

The Proposed FAS 5 Requirement requires qualitative and quantitative assessments of litigation, including most likely outcomes and estimates of exposure to any litigation in which the chance of loss is more than "remote." These assessments could end up being used against us in court and could negatively impact us in any future settlement, especially if such forward-looking estimates eventually turn out to be incorrect or over-stated.

We will have to value a claimant legal action even if they don't provide a claim.

The Proposed statement requires that we must provide its "best estimate of the maximum exposure to loss" if a claimant has given "no claim or assessment amount." Essentially, this would force us engage in speculation in order to value their claim. In addition, such valuations provide claimants key information that could drive the outcome of the case, thereby damaging our defenses and thus, our business interests.

SEC periodic report on the status of open litigation will be harmful to investors.

Litigation is an extremely complicated and strategic chess game where conflicting actions are sometimes made in multiple forums in pursuing the long-term interest of the companies in dispute. Sometimes litigation develops due to the publicity or political nature of a matter, rather than the actual facts of the dispute, thus further complicating the legal analysis. Thus, such disclosure, even though presumed to be accurate, could nonetheless be incomplete unless our entire litigation strategy were disclosed, which could result in excessively lengthy disclosures in the financial statements; otherwise investors may be misled.

The frequency and level of detail of the Proposed FAS 5 Requirements are mainly immaterial and would be extremely expensive to produce.

The Proposed FAS 5 Requirements significantly increase the amount of information a large Fortune 500 company must maintain and track, especially since the vast majority of this information would be deemed to be "immaterial" to most investors. Quantitative disclosures must include facts about the claim or assessment (including applicable damages, such as punitive or treble), or, "best estimate of the maximum exposure to loss." Additionally, a company must also include quantitative and qualitative assessments of relevant insurance and indemnification arrangements. Little of this

information would be material to investors and would be extremely expensive to produce.

More protection for prejudicial information is required.

The Proposed FAS 5 Requirement would allow us, in "rare instances," to "forgo disclosing prejudicial information," although we would still be required to provide the amount of the claim and disclose why it was omitted. The "rare instance" standard is too limited for a large Fortune 500 company as there are many cases that may be deemed to be prejudicial. In addition, possible claimants will have information to link our disclosure with an actual case, negatively impacting us.

Inaccurate estimates and assumptions will be sources of additional litigation.

The unpredictability and subjectivity of litigation makes most claims nearly impossible to predict any eventual outcome with much certainty. Incorrect estimates and assumptions will provide future claimants with new arguments that they relied on disclosures which later turned out to be inaccurate and, therefore will contribute to additional lawsuits.

Thank you for your consideration of our concerns.

Very truly yours,

Reed N. Brimhall
Vice President, Controller &
Chief Accounting Officer
URS Corporation