



September 20, 2010

**HAGEN, KURTH,
PERMAN & CO., P.S.**

Financial Accounting Standards Board
Technical Director
401 Merritt 7
Norwalk, CT 06586-4116

**CERTIFIED
PUBLIC
ACCOUNTANTS**
Member of CPAmerica
Affiliated with
HORWATH internationally

Via email: director@fasb.org

Re: Exposure Draft Topic 450, Contingencies, and
Exposure Draft Sub-topic 715-80, Compensation – Retirement Benefits -
Multiemployer Plans

Dear Technical Director,

As a local public accounting firm whose clientele focuses on closely held businesses, we are writing today to express opposition of the two above mentioned exposure drafts.

We are opposed to these exposure drafts in their current form for several reasons. The proposed requirements will put undue pressure on our clients at a cost that is greater than the benefits. In addition, there is concern that readers of such disclosures may not understand the intricacies of the disclosures. Also, these changes may cause the accrual of liabilities that are not likely to be realized.

Thank you for the opportunity to comment on these exposure drafts and I want to restate our opposition to finalization of these exposure drafts in the current form.

Sincerely,
HAGEN, KURTH, PERMAN & CO., P.S.

Jennifer A. Rinker, CPA

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