



October 14, 2010

(Via U.S. Mail and Electronic Mail)

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

Attn: Technical Director – File Reference No. 1820-100

Re: Comments on the FASB and IASB's Exposure Draft on Revenue Recognition from
Contracts with Customers

Dear Board Members:

As a chief financial officer of a major construction firm, I represent my company in stating that we are extremely interested in the Board's project on revenue recognition. It is our desire to ensure that high-quality accounting practices in the construction industry are maintained.

We have significant concerns over how the new standard may be applied to Traylor Bros., Inc. (TBI). The current guidance in the Exposure Draft for recognizing revenue at the "performance obligation" level presents significant challenges for TBI and carries the very real risk of adverse economic effects on our industry stemming from an inferior method of revenue recognition. The inherent subjectivity of the prescribed process for identifying and allocating revenue to performance obligations will lead to less consistency and transparency in the financial reporting process in the industry. The inherent subjectivity also opens the door to financial engineering and outright manipulation. There are significant concerns in the surety community about any approach that diminishes consistency and increases subjectivity. As a result, surety credit will become marginally more difficult to obtain in the future in order to offset the risks associated with inferior accounting rules.

We believe the Board is hearing negative feedback from the construction industry because the proposed revenue recognition rules are divorced from economic reality. But we also believe that it is possible to make relatively modest refinements to the guidance under the proposed standard in order to align the revenue recognition rules with economic reality.

Specifically, we request that the Board recognizes that, in most cases, ALL construction activities for a given project are highly interrelated and have overall risks which are inseparable. Therefore, construction companies lack a basis for determining the price at which it would sell the components of a contract separately. As such, characteristics of distinct profit margin will not be met (in most cases). Hence, there are typically no more than a single performance obligation for most construction contracts.

We concur with the guidance in the Exposure Draft regarding continuous transfer and we believe it is appropriately reasoned.

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With respect to determining the contract price, we believe that variable consideration (i.e. bonuses or penalties) should be excluded from the calculation of contract revenue until such time as their realization is reasonably assured. Until that time the inclusion is highly subjective and, as a matter of course, we believe that most users of financial statements will not want to see such amounts included in revenue until their realization is reasonably assured.

While we appreciate the Board's efforts to create a single standard to apply to virtually all industries and transactions, we maintain a belief that the key principals of the proposed standard need to be interpreted in such a way to preserve the key tenets of SOP 81-1. Otherwise, the Board runs the very real risk of creating inferior accounting rules when applied to the construction industry.

Finally, we ask that private companies be given at least one additional year to comply with the proposed standard once it becomes effective for public companies.

Sincerely,

TRAYLOR BROS., INC.



Don C. Bartow
Vice President/CFO

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