From: Nancy Hammond
To: Director - FASB

Subject: FSBA proposed Union withdrawal liability reporting requirements

Date: Thursday, October 21, 2010 12:26:15 PM

To Whom It May Concern:

I am in opposition to your new proposal for Union withdrawal liability reporting requirements for a few basic reasons:

- #1 Cost to employer/employees/union to implement new plan and duplicity of information requested.
- #2 Cost to employer for funds assets and benefit obligations including proposed "contribution trends". We are a union contractor who abides 100% by the signed union contract between ourselves and our employees and their union. Your "contribution trend" would ask us to ignore a signed contractual obligation and either increase or decrease a contribution based on some person's opinion of what may or may not happen in the future. This is absolutely ridiculous!
- #3 Potential influences on my company's ability to obtain credit due to the reporting withdrawal liability.

Please give my reasons some serious thought before making any attempt to change the reporting requirements. What may seem like a simple, reasonable request for FSAB purposes will have great financial impact on employers and thus our employees long into the future and now IS NOT the time to attempt such a major change.

Sincerely,

Nancy Hammond President RELIANCE FIRE PROTECTION INC 206-682-6636