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Financial Accounting Standards Board (FASB)
401 Merritt 7, P. O. Box 5116
Norwalk, CT 06856-5116
Attention: Technical Director

RE: File Reference No. 1860-100

To the Technical Director:

As a small business owner in a very difficult economic climate, I have many pressing issues that vie for my attention during any given day right now. Like many owners in similar situations, I am trying to insure that my business can stay competitive in an extremely difficult marketplace by minimizing costs and asking my current employees to stretch their resources as far as possible. One thing I do not need at this time is more rules and regulations that add costs onto the bottom line of my company.

I recently became aware of new accounting rule changes being proposed by the FASB that I believe will significantly impact my business in a negative fashion. I feel so strongly about this that I have decided to take the time to voice my concerns with you in the hopes of preventing these changes from being implemented. In particular, I believe that **Topic 715-80 (*Exposure Draft on Compensation-Retirement-Benefits-Multiemployer Plans*)** will be especially burdensome due to the sheer number of additional reporting requirements it places on companies that are involved in these plan types. These additional reporting requirements will either pull current employees away from other responsibilities or require an expansion of our office staff that will negatively impact our overhead costs and make us less competitive in the marketplace.

A second concern of mine is **Topic 450 (*Disclosure of Certain Loss Contingencies*)**. It appears almost certain that if implemented in its current form – with the threshold of change going to “remotely possible” – this new requirement will force companies involved in these types of plans to perform numerous Withdrawal Liability calculations. This type of work takes a certain type of expertise that will most likely need to be outsourced, and I am afraid that the costs will inevitably fall on my business. As I have stated previously, my business cannot afford to incur additional costs that are not going towards expanding our market-share in this present market environment.

This is just a brief summary of many concerns I have with the current changes proposed by the FASB. It is my sincere hope that the members of your board will come to the realization that small businesses are facing extraordinary times right now. These times are forcing owners such as me to find innovative ways to get more done with the fewest resources possible. I sincerely hope that I will not be facing more expansive regulations from the FASB that could counter other measures I am taking to stream-line my business. I appreciate you taking the time to consider my concerns.

Sincerely,
Peter D. Furness Electric Co. Inc.

Daniel J. Hahn, Sr.
President