

Our Companies success depends on a solid financial base, along with our ability to get bonded for our construction projects. The new proposals set forth by the FASB will make it even more difficult to compete for work that is available. The proposals, if implemented, would require our Company to disclose "estimates" of our "potential" withdrawal liabilities in our audited financial statements, making our ability to secure a line of credit and improve our bonding limits very difficult.

We agree that transparency is important; however I ask you to consider all of the implications of these changes and ask yourself does the benefit outweigh the costs and potential impact on the construction companies who participate in multiemployer defined benefit pension plans.

In conclusion, we are strongly opposed to your Proposed Accounting Standards Updates. The implications of the proposals are serious and need to be reevaluated.

Thank you for your consideration.

Luke R. Cunningham

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President