

November 1, 2010

Via E-mail: director@fasb.org

Mr. Russell Golden, Technical Director Financial Accounting Standards Board 401 Merritt 7 PO Box 5116 Norwalk, CT 06856-5116

RE: Comments on File Reference No. 1860-100

Compensation . Retirement Benefits . Multiemployer Plans (Subtopic 715-80)

Disclosure about an Employers Participation in a Multiemployer Plan

Dear Mr. Golden & Board Members:

I am writing on behalf of the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (USW) and as an Employee Trustee on a number of Taft-Hartley multiemployer pension plans in which the USW participates. We appreciate FASB¢ efforts to create more transparency in corporate financial statements; however, we are concerned about the changes proposed in the Compensation . Retirement Benefits . Multiemployer Plans (Subtopic 715-80) Exposure Draft. Our concerns about the proposed changes are similar and overlapping with the concerns that we had related to the proposed changes to the Contingencies rules. We believe that the proposed changes provide very little in the way of new meaningful information and in many cases will provide information which is in fact misleading. Meanwhile they will create an unreasonable burden for participating companies and the plan trusts and have the potential to have a serious detrimental impact on the beneficiaries of the trusts.

The extensive amount of information which the proposed changes would require a company to report would impose an unreasonable administrative burden on the reporting companies and also on the pension funds themselves. While some of the information is readily available, some information like withdrawal liability must be calculated by a third party actuary and will not only add time and expense, but a company will either have to delay their reporting or use outdated information. Information like the extent to which the reporting employer can be liable for other participating employersqobligations may be very difficult to calculate and require a great deal of speculation on the part of the reporting employer.

This added expense and time will not result in the clarity that the FASB is intending to create. On the contrary, it will require employers to report a liability which they are only required to pay if they withdraw, in spite of the fact that they have no intention of withdrawing. Even if withdrawal were to occur, it is possible that the withdrawing company will not pay the full amount of their assigned withdrawal liability in that particular year; in many cases they may pay less than the full amount and pay it over a period of time. Reporting withdrawal liability does not shed light on the potential timing and amounts of cash flows.

Furthermore, because of the way ERISA reporting works, multiemployer plans will not have calculated the withdrawal liability for a given year until long after annual financial statements for the participating companies have been generated. Reporting companies will be required to use outdated information and given the volatility in the market over the past few years, pension asset values (and therefore the unfunded liability) have the potential to swing widely from year to year, making the outdated information potentially misleading.

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union

The reporting standards contemplated by this exposure draft will force the users of financial statements to parse through potentially several pages of notes, only to find information which does not actually add transparency in regards to the risk a company faces.

The impact of these changes on the plans and their participants could be substantial, and I will reiterate the comments we made concerning the reporting of withdrawal liabilities under the proposed changes to Contingencies reporting.

First, requiring a company to report withdrawal liability when there is a very small likelihood that the company will actually have to pay withdrawal liability will deter prospective employers from considering participation in a multiemployer fund and may even cause existing participants to consider withdrawing. On top of the requirements imposed by the Pension Protection Act of 2006, these new regulations may serve as a final nail in the coffin for multiemployer pension plans. The changes would not only adversely impact existing beneficiaries of existing funds, but may also ultimately remove a tool for providing retirement security which, when properly administered, provides far more retirement security for beneficiaries than a 401(k) or similar defined contribution plan.

Second, the additional reporting requirement will add additional expense. Regardless of whether that expense is borne by the multiemployer plans or the reporting companies (we anticipate that there will be costs borne by both), it will ultimately mean less money for the beneficiaries. Spending money otherwise intended for the beneficiaries of the plan on administrative expenses that ultimately do not provide the intended benefit to the investors in the participating companies is unnecessary and irresponsible.

It is clear that a company which intends to withdraw or is in the process of withdrawing from a multiemployer plan with a withdrawal liability should disclose these expected payments to its investors. Reporting a withdrawal liability when (a) the health of the underlying plan is good, (b) there is no expectation of withdrawal, and (c) the timing and amount of cash flows is indeterminable if a withdrawal were to occur is not only unhelpful to investors but burdensome to the company and the multiemployer plan in which it participates. These new rules have the potential to cause investors to deny capital to financially sound companies and could have serious implications for the multiemployer pension plans and their participants.

For these reasons we respectfully recommend that the existing disclosure guidance be retained and the proposed changes in this Exposure Draft not be finalized as they currently stand. As an alternative, we would propose that participating companies be required to report the impact of any funding improvement plan, rehabilitation plan or surcharge on their anticipated cash flows to the plan if the plan is in endangered or critical status. This alternative would get at the heart of the amount and timing of cash flows as a result of participation in the plan and represent information which is more certain than withdrawal liability.

Thank you for the opportunity to provide comments on this these matters; we appreciate your consideration of our views. We would be happy to provide you with any additional information on our position that you may find useful.

Sincerely,

Stan Johnson Secretary-Treasurer