



October 29, 2010

Technical Director
File Reference No. 1860-100
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

**Re: File Reference No. 1860-100, Proposed Accounting Standards Update—
Compensation—Retirement Benefits—Multiemployer Plans (Subtopic 715-80): *Disclosure
about an Employer's Participation in a Multiemployer Plan.***

Dear Sir or Madam:

As a member of the Board of Directors of the Southern Illinois Builders Association, a chapter of the Associated General Contractors of America (AGC), we strongly align our chapter and its 509 members with the comments included in AGC's letter regarding the Exposure Draft, *Disclosure about an Employer's Participation in a Multiemployer Plan*. We strongly urge the Board to withdraw the current proposal for reconsideration due to the many potentially negative impacts on employers who participate in multiemployer plans.

We share AGC's concerns that the Exposure Draft includes extensive miscalculations and oversimplifications. Our concerns are many and include some of the following:

- The draft under appreciates the costs associated with compliance and over estimates the relevancy of the information that would be provided if the Exposure Draft were to go into effect as written.
- Any information included will be neither timely nor accurately reflective of the financial impact of participating in a multiemployer plan.
- The Exposure Draft underestimates the complexity of the relationship between employers and multiemployer plans and significantly underestimates the importance of the construction industry exemption that makes almost any liability merely theoretical rather than material.

Like AGC, our chapter strongly urges the Board to withdraw the current proposal for reconsideration.

Sincerely

HOLLAND CONSTRUCTION SERVICES, INC.

A handwritten signature in black ink that reads "Bruce B. Holland".

Bruce B. Holland
President

cc: Southern Illinois Builders Association

The following people have submitted the exact same comment letter as the one shown.

BRUCE B. HOLLAND

BILL TINDALL

MARK HINRICHS

GERALD E. STALEY