



**J.L. MARSHALL & SONS, INC.**  
**GENERAL CONTRACTORS**

November 8, 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 union contractor and member of the MA, RI, and CT AGC, we strongly urge the Board to withdraw the current proposal regarding the Exposure Draft, *Disclosure about an Employer's Participation in a Multiemployer Plan*.

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 company strongly urges the Board to withdraw the current proposal for reconsideration.

Sincerely,

Leo K. Marshall  
Treasurer

LKM/slf