

Via e-mail: director@fasb.org

August 27, 2010

Financial Accounting Standard Board Technical Director 401 Merritt 7 Norwalk, CT 06586-5116

RE: Disclosure of Certain Loss Contingencies File Reference Number 1840-100

Gentlemen:

As a mid-sized family owned construction company we would like to weigh in on the proposed change to the reporting requirement for any potential withdrawal liability from multi-employer plans. We are firmly opposed to the proposed change.

We have several reasons for our opposition. The first involves our ability to gather the information in a timely and accurate manner. As we are sure you know, the computation of withdrawal liability is an actuarial calculation. Few funds, if any, make this calculation regularly as a matter of procedure. Fewer funds, if any, employ an actuary on staff and would have to retain their actuary to complete these calculations annually. It is an unnecessary expense to the fund that would surely be passed back to the business owner who has requested the information. For a company like ours that deals with multiple unions, multiple locals and multiple plans this problem is greatly compounded and the costs multiplied.

Second, and probably most important, the disclosure of this information to those who may not understand the intricacies of ERISA that would cause this potential liability to blossom into an actual liability will most surely confuse and frighten those who contractors need most - our lenders, suppliers and sureties. It will cause them to react by imposing stricter loan covenants, require additional security, tighten credit terms or at worst non-renew credit lines and bond lines.

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Third, despite the fact that ERISA carves out an exemption from this liability for contractors, inevitably, the next logical step will be to require that this remote potential liability be reported on the balance sheet as a true liability. That would ruin the balance sheets of perfectly healthy companies and be devastating to every small and mid-size contractor in the country. Our fear is that the footnote requirement will have the same practical effect.

Finally, the calculation of the withdrawal liability itself is part science and part art. It relies on several assumptions that are made by the trustees of the plan upon which we have no input and that may or may not be accurate. Inclusion of this note would require further language that says that management can in no way verify or vouch for the figures provided.

We appreciate the ability to comment on this proposed change and again want to state our total opposition to the finalization and implementation of the proposed language.

Very truly yours,

M & O INSULATION COMPANY

Peter F. Castellarin Chief Executive Officer