



TRI-CITY ELECTRIC CO., INC.

Electrical Construction and Service

ESTABLISHED 1946

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October 25, 2010

Technical Director
Financial Accounting Standards Board
File Reference No. 1860-100
401 Merritt
Norwalk, Connecticut

To Whom It May Concern:

This letter is being written to oppose FASB Proposal 715-80, "Multiemployer Pension Plans" and Topic 450, "Disclosure of Certain Loss Contingencies."

Although I can understand and support transparency and the idea that my creditors need accurate financial information, my concern is that you are requiring me to provide misleading and out-of-date information which will directly affect my company's ability to secure bank lines of credit and surety bonds. In addition, costs to provide this misleading information to my accountant is very expensive and in some cases impossible to provide, i.e., percentage of the active and retired employees that have worked for my company.

Withdrawal liability by law can only be assessed if our company closes our door as a union shop and opens up across the street non-union. We are a 3rd generation union shop (65 years in operation) and have no intention to change our labor source.

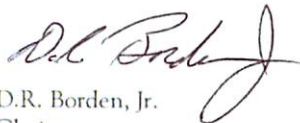
Your position that "one-size fits all standards" is not appropriate for multi-employer pension plans. The end result of these proposals could have catastrophic results in the unionized segment of the construction industry. In our case, reduction of our credit line and loss of bonding will spell the end for a viable union electrical contractor employing an average of 250 electricians per year.

We respectfully urge you to reconsider these proposals and at least provide a special provision for the construction industry as our government has done with respect to withdrawal liability under ERISA.

Thank you for your consideration in this matter,

Sincerely,

TRI-CITY ELECTRIC CO., INC.


D.R. Borden, Jr.
Chairman

DRB:dd

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