1200 Koppers Building 436 Seventh Avenue Pittsburgh, PA 15219-1818 412-227-2500 P 412-227-2050 F www.blumlinggusky.com

ROBERT J. BLUMLING RBLUMLING@BGLAW-LLP.COM

November 1, 2010

Via email: director@fasb.org

Technical Director Financial Accounting Standards Board 301 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:

On behalf of Blumling & Gusky, LLP, I respectfully submit the following comments in response to the Exposure Draft, *Disclosure about an Employer's Participation in a Multiemployer Plan.* We appreciate the efforts of the Board and its staff in preparing the Exposure Draft and for the opportunity to comment on the proposed principles.

Blumling & Gusky, LLP is a construction litigation law firm company operating in downtown Pittsburgh, western Pennsylvania. Many of our firm's clients in the construction industry contribute to multiemployer pension plans. Our company has over 30 years of experience in providing legal services to constructors who build highways and bridges, etc.

Blumling & Gusky, LLP's concerns about the Exposure Draft are extensive, and I would like to summarize our concerns briefly. For a more detailed explanation, we reference comments already submitted by two associations, one national and the other local, that our company belongings to: the Associated General Contractors of America (AGC) and the Constructors Association of Western Pennsylvania (CAWP).

We believe the draft under appreciates the costs associated with compliance and overestimates the relevancy of the information that would be provided if the Exposure Draft were to go into effect as written. We believe that any information included will be neither timely nor accurately reflective of the financial impact of participating in a

multiemployer plan. We believe 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.

Based upon these facts, we strongly urge the Board to withdraw the current Exposure Draft for reconsideration and rewrite the proposal, taking into account the points and suggestions in our response. Due to the potentially negative economic impact of the proposal on employers who participate in multiemployer plans, we are concerned that the Exposure Draft, in its current form, would create undue hardships for employers that are already struggling to weather the economic recession.

Thank you for your consideration of our views.

Very truly yours,

BLUMLING & GUSKY, LLP

Robert J. Blumling

RJB/crc