



November 1, 2010

Sent via email: director@fasb.org

File reference No. 1860-100

Technical Director
File Reference 1860-100
FASB 401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-511

Dear Technical Director,

Marquette Associates, Inc. appreciates this opportunity to comment on the Proposed Accounting Standards update in regards to Compensation – Retirement Benefits – Multiemployer Plans, Disclosure about an Employer’s Participation in a Multiemployer Plan, issued by the Financial Accounting Standards Board (“FASB”) on September 1, 2010. Marquette Associates is an independent investment consulting firm working with multiemployer pension plans, as well as public, corporate, foundation and endowment plans.

Marquette has not previously commented on proposed disclosure but in this particular case, we feel that our feedback is warranted. FASB has invited individuals and corporations to comment on the proposed Update and we believe that this proposal will have an adverse effect on our clients and their contributing employers.

As investment consultants, one of our primary responsibilities is coordinating the hiring of professional money managers to invest our clients’ equity and fixed income portfolios. Since the Update was posted, we have not received any feedback from our professional money managers that this proposal would provide them with any additional transparency as they evaluated companies for investment.

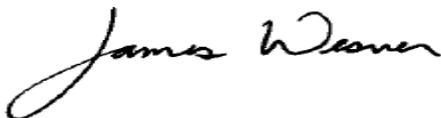
In addition, we do believe that the proposal could have unintended consequences. The timing of information would be significantly lagged and would have limited value to any analysis of a company’s viability. On the contrary, information would likely be outdated and potentially hinder an appropriate analysis of a company’s true financial state.

Our final observation regards the anticipated effect on the administrative costs to the multiemployer defined benefit pension plans. These plans are already under intense

administrative burdens and this proposal will likely increase the number of inquires to the funds and the amount of time to respond.

Marquette Associates appreciates this opportunity to respond to the FASB proposal. If you have any additional questions on our response, please do not hesitate to contact us.

Regards,

A handwritten signature in black ink that reads "James Wesner". The signature is written in a cursive style with a large, sweeping initial 'J'.

James R. Wesner, CFA
Vice President