Private Company Financial Reporting Committee
401 Merritt 7, PO Box 5116, Norwalk, Connecticut 06856-5116 443-480-5800
e-mail: judyodell@dmv.com

Judith H. O'Dell CPA CVA
Chair

November 9, 2010

Ms. Leslie Seidman
Acting Chairman
Financial Accounting Standards Board
401 Merritt 7
Norwalk, CT 06856

Re: Proposed Accounting Standards Update, *Disclosure about an Employer's Participation in a Multiemployer Plan* ("proposed ASU")

Dear Ms. Seidman:

The Private Company Financial Reporting Committee has reviewed the proposed ASU and offers its comments and recommendations below.

Question 1: *Do you agree that the proposed quantitative and qualitative disclosures will result in a more useful and transparent disclosure of an employer's obligations arising from its participation in a multiemployer plan? Why or why not? If not, what changes would you suggest to the proposed amendments?*

Generally, PCFRC members find the proposed disclosures to be useful information to a private company financial statement user's decision making and ability to forecast cash flows. Existing pension disclosures could be improved, as their usefulness in helping cash flow prediction is limited. The Committee is concerned about the additional costs that would be imposed on private company financial statement preparers and practitioners in reporting the proposed disclosures. Also of concern to several user members of the PCFRC is that the information necessary to prepare the proposed disclosures will not be obtainable on a timely basis, due to the regulatory and compliance deadlines that drive pension plan reporting. This could delay issuance of financial statements as private companies may have no ability to compel pension plans to provide the needed information on a more timely basis. Nevertheless, financial statement users should benefit from the disclosure of somewhat outdated information compared to the disclosures currently required.

Question 5: *The Board intends to defer the effective date for nonpublic entities, as defined in transition paragraph 715-80-65-1, for one year. Do you agree with the proposed deferral? If not, please explain why.*

The PCFRC agrees with the Board's intention to defer the effective date for nonpublic entities for one year.

Question 6: *In addition to the deferral for nonpublic entities, should any of the provisions in this proposed Update be different for nonpublic entities (private companies and not-for-profit organizations)? If so, which provision(s) and why?*

Of special concern to the PCFRC is the impact of the proposed ASU on the construction industry and the users of their financial statements in the surety industry. A construction contractor or subcontractor may be signatory to a number of unions, which would significantly increase the cost of compliance with the proposed ASU. Also, regarding disclosures about withdrawal liabilities, the FASB may need to take into consideration the unique rules that apply to those liabilities in the construction industry. The PCFRC refers the FASB to comment letters submitted by the Construction Financial Management Association and the Surety and Fidelity Association of America for a detailed explanation of the issues and concerns that the proposed ASU would create in the construction/surety sector. The PCFRC recommends that the FASB consider providing some level of exemption or disclosure relief to companies operating in the construction industry and companies with highly transient employees.

The PCFRC appreciates the FASB's consideration of these comments and recommendations. Please feel free to contact me if you have any questions or comments.

Sincerely,

Judith H. O'Dell
Chair
Private Company Financial Reporting Committee