GENEVA CONSTRUCTION COMPANY, INC.

SINCE 1926

October 25, 2010

Mr. Russell Golden
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Re: File Reference #1840-100

Disclosure of Certain Loss Contingencies

Dear Mr. Golden,

I appreciate the opportunity to provide comments on the FASB proposal to included potential loss contingencies for the withdrawal from a multi-employer defined benefit pension plan. Geneva Construction Company (GCC) is opposed to this proposal by FASB.

GCC is a heavy and highway contractor in the Chicagoland area, signatory to various labor unions. Within the collective bargaining agreement with these unions, provisions are included for GCC to contribute to defined benefit pension plans. By including or showing a potential loss on a balance sheet either directly or as footnote could be construed as problematic by third parties analyzing our financial statement. I feel the information obtained by the plan's auditors will be impossible for our accountants to verify, and will question the validity of our annual audit. This could be looked on negatively when succoring surety bonds in our normal business operations and has the potential to add unnecessary expenses to all bonded projects.

I feel *IF* any standard change to reporting standards for potential loss contingencies in multi-employer defined benefit plans, it should only apply to companies that are withdrawing from the multi-employer plan. The best-case and most prudent scenario is for the FASB to withdraw the proposed changes.

Very truly yours,

Geneva Construction Company

John P. Bryan

Procident





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