October 27, 2010

Via Email director@fasb.org
Technical Director, File Reference No. 1840-100
FASB
401 Merrit 7
PO Box 5116
Norwalk, CT 06856-5116

RE:
Proposed Comments
Contingencies (Topic 450)
Disclosure of Certain Loss Contingencies

Dear Technical Director:

The West Michigan Mechanical Contractors Association (WMMCA) is a non-profit trade association representing union mechanical contractors in West Michigan. The WMMCA was established to represent and service, its members in Grand Rapids, Muskegon and the Lakeshore areas of Michigan. Association members dedicate themselves to quality, dependability, safety, education and community service as they serve as the primary liaison for labor relations and multi-employer collective bargaining.

Contractor members and contributors jointly administer and contribute to collectively bargain a multiemployer ("Taft-Hartley") defined benefit pension fund for members of the West Michigan Plumbers, Fitters and Service Trades Local Union No. 174.

The proposed disclosures concerning Disclosure of Certain Loss Contingencies will cause confusion and possible misuse of the information. The disclosures will have the effect of requiring all contributing contractors to report potential withdrawal liability when the contractor ***has no intent*** to withdraw from the plan. Remote possibilities do not add value to users of financial statements.

The disclosures will not reflect current information as withdrawal liability is after the Defined Benefit Pension Plan's (Plan) fiscal year end which is the end of June. Contributing contractors probably will not have coincident Plan years and fiscal years. Untimely information can be misleading either positively or negatively.

Under the FASB proposals, contribiting contractors would be required to disclose withdrawal liability even though it would not be incurred and the information could be very untimely. ***We encourage you not to adapt*** these proposals.

Thank you for the opportunity to provide comments.

Respectively Submitted,
Cindy Morse
WMMCA Executive Director