Letter of Comment No: 97
File Reference: 1215-001
Date Received: 91205

Big Lots Stores, Inc. 300 Phillipi Road Columbus, Ohio 43228-5311

Letter of Comment No: File Reference: 1215-001

Date received:

September 12, 2005

Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

Sent by electronic mail to director@fasb.org

Re: File Reference 1215-001 -, Proposed Interpretation on Accounting for Uncertain Tax Positions – an Interpretation of FASB Statement No. 109

We appreciate the opportunity to comment on the Exposure Draft ("ED") of the proposed interpretation of FAS 109. At this time, we would only like to address Issue 11 of the ED.

Issue 11: Effective Date and Transition

We believe that if a model is adopted that is substantially different from current accounting principles (principally FAS 5), that the effective date set forth in the ED be delayed to years ending after December 15, 2006. Accounting system changes, process changes (including changes to comply with section 404 of the Sarbanes-Oxley Act) and additional analysis will be necessary and therefore, substantial resources will be required to meet this incremental burden. Moreover, without a delay, this burden would coincide with implementation efforts of FAS 123-R, of which income taxes is a significant component. All these changes are coming on the heels of systems changes that were needed to comply with Schedule M-3 for the 2004 corporate income tax returns' filing season that occurs for a substantial number of registrant-taxpayers in late summer/early fall of 2005.

We agree with the Board's conclusion on transition.

Thank you in advance for your consideration of our comments.

Sincerely,

L. Michael Watts Vice President, Tax

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