

Mr. Robert H. Herz Chairman, Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116



LETTER OF COMMENT NO. 174

## Dear Chairman Herz:

On behalf of Syniverse Technologies, Inc., I strongly urge the Financial Accounting Standards Board to delay the effective date of FIN 48 on Accounting for Uncertainty in Income Taxes to allow companies sufficient time to address the substantive, procedural and documentation challenges presented by the new interpretation. Specifically I recommend that the effective date of FIN 48 be deferred to fiscal years ending after December 15, 2007. The challenges of implementing FIN 48 were articulated by Tax Executive Institute in a letter sent to you on December 12, 2006.

In summary, extending the deadline for implementing FIN 48 will permit companies and their independent auditors to resolve unanswered questions and thus reduce the likelihood of diversity in practice, which in part prompted the development of FIN 48 in the first instance.

Respectfully,

Charles O. Mills

Tax Manager

Syniverse Technologies, Inc.



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Respectfully,

Wayne Melson

Vice President - Controller Syniverse Technologies, Inc.