PPD®

LETTER OF COMMENT NO. 175

January 3, 2007

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

Dear Chairman Herz:

On behalf of Pharmaceutical Product Development, Inc. (PPD), 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 us sufficient time to address the substantive, procedural, and documentation challenges posed by the new interpretation. Specifically, I recommend the effective date of FIN 48 be deferred to fiscal years beginning after December 15, 2007. The challenges of implementing FIN 48 were articulated by Tax Executives Institute in a letter it sent to you on December 12, 2006.

At PPD we are experiencing the same challenges communicated by TEI in December. We have devoted a significant amount of resources to determining our FIN 48 adjustment, however at this time we still have many open questions and work to complete prior to disclosing our FIN 48 adjustment in the 2006 Form 10-K to be filed in February, 2007. After our questions are resolved it will take considerable time to finish our analysis and develop the documentation that our auditors require to support the FIN 48 adjustment amount.

In summary, extending the deadline for implementing FIN 48 will permit companies like PPD 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,

Patti Oswalt, CPA
Tax Director
Pharmaceutical Product Development, Inc.

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