THE MARMON GROUP, INC.
225 West Washington Street, Chicago, Illinois 60606-3418
Telephone (312) 372-9500 Fax (312) 845-5305 www.marmon.com

LETTER OF COMMENT NO. 194

January 4, 2007

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

Dear Chairman Herz:

On behalf of The Marmon Group, Inc., I strongly urge the Financial Accounting Standards Board to delay the effective date of FIN 48, *Accounting for Uncertainty in Income Taxes*, to allow companies sufficient time to address the substantive, procedural and documentation challenges posed by the new interpretation. Specifically, I recommend that 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.

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,

James D. Angus, Jr.
Vice President – Taxes
The Marmon Group, Inc.

JDA/lam

cc: Robert K. Lorch, C.F.O.
Michael J. Horn, Vice President and Controller