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January 4, 2007

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



LETTER OF COMMENT NO. 11

Dear Chairman Herz:

We continue to support the Board's goal of improving financial reporting for income taxes through the adoption of FASB Interpretation No. 48 *Accounting for Uncertainty in Income Taxes*. However, the burden of adopting FIN 48 in accordance with the prescribed effective date has proven to be a substantial task. From our perspective, there are still considerable differences in opinion among preparers and auditors of financial statements on the practical details of applying the standard and preparing the related documentation to support the conclusions reached. In the short term, these differences will likely result in additional diversity in practice.

On behalf of UPS, I strongly urge the Board to delay the effective date of FIN 48 to allow companies sufficient time to appropriately 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.

Extending the effective date will permit companies and their independent auditors sufficient time to resolve unanswered questions and thus reduce the likelihood of diversity in practice, which prompted the development of FIN 48 in the first instance.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Scott Davis".

D. Scott Davis
Vice Chairman and Chief Financial Officer