



LETTER OF COMMENT NO. 108

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 NBT Bancorp, 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 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,

A handwritten signature in cursive script, appearing to read "Anthony J. Ciccarelli".

Anthony J. Ciccarelli, Vice President, Corporate Tax Manager
NBT Bancorp, Inc.