AMERICAN BANKERS ASSOCIATION

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June 23, 2006

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

Re: Re-exposure of Uncertain Tax Positions Proposal

Dear Bob:

The American Bankers Association is responding to the recent decision by the Financial Accounting Standards Board to issue a final FASB Staff Position (FSP) on Uncertain Tax Positions (UTP). We are concerned about the disclosures that the FASB intends to include in the FSP and are requesting that you expose the new disclosures for comment.

The May 10, 2006 FASB meeting included a discussion of the FASB staff's suggested format for disclosure, which included a tabular reconciliation of the beginning and ending balances of unrecognized tax benefits and required additional specific detailed disclosure for positions that could potentially change significantly in the 12 months following the balance sheet date. The FASB approved the suggestions for disclosure and directed the staff to draft the final interpretation without providing re-exposure prior to release.

The original proposal did not include these new disclosures, which represent a significant departure from the initial proposal. ABA members are concerned, and we believe re-exposure is warranted in order to provide an open and thorough deliberation process.

Thank you for your consideration of this request. Please call me with any questions.

Sincerely,

Donna J. Fisher

Donna J. Fisher

Cc: Donald Thomas