



LETTER OF COMMENT NO. 73

27275 Haggerty Rd.

Suite 680

Novi, MI 48377

January 8, 2007

Mr. Robert H. Herz Chairman, Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-51165

Re: Proposal to Delay the Effective Date for FIN 48

Dear Chairman Herz,

We are members of both Tax Executives Institute, Inc.(hereinafter, "TEI") and the Manufacturers Alliance (hereinafter, "MAPI").

We realize you have seen and read both the MAPI and TEI discussions and we fully support their call to delay the implementation date of FIN 48.

We are troubled with the very short time between the July 13, 2006 issuance date of FIN 48 and the effective date of all fiscal years beginning after December 15, 2006. As a calendar year company, this date is far too short.

The release date came during the height of tax compliance season. Many calendar year companies, including our company, had their first electronic Federal tax return filing and the precious few resources many companies have, including ours, were dedicated to meet the September 15, 2006 extended filing date. The September filing date is immediately followed with state and local compliance that covers the remainder of September and October and part of November. This also must be balanced with the demands of closing the Q-2 2006 and Q-3 2006 books for SEC registrants, budgeting and forecasting, the holiday season and the upcoming 2006-year end closing and audit.

We have done our best to read the interpretation and obtain training. This is where issues become more difficult. Most of the "big 6" firms have had some training but it has been very late in the process, is inconsistent among the different firms and is only North American focused.

We are a multi-national corporation and have found the "big six" accounting firms and most of the large law firms we deal with have provided little or no training to their international colleagues. These firms are the very resources necessary for a complete and accurate assessment of uncertain tax positions on a global basis. Our experience to date has been that we have outlined FIN 48 and designed some reporting schedules. We find that we are not only training our own financial people, outside of North America, but those who should be assisting in the analysis and those charged with auditing the process. The implementation of FIN 48 is occurring faster than the global community can react and become educated and therefore it jeopardizes the quality of the outcome.

We are concerned with the different firms varied interpretations of what is material, how much documentation is "sufficient" for a position, what level of detail is needed to determine the ranges to measure on uncertain position, when is a position final, and the numerous new disclosures that are proposed without the benefit of any comments from the public.

We understand the desire for greater certainty surrounding tax matters but the rush to implement this interpretation is causing more uncertainty than it is designed to correct.

We respectfully ask that the interpretation be delayed at least until fiscal years ending after December 15, 2007, as was requested by both TEI and MAPI.

If you have any questions, please direct them to myself or Dennis Pike our VP of Tax

Sincerely,

Tower Automotive Inc.

James A. Mallak

Chief Financial Officer