

Kevin Green Director of Tax

Advance Auto Parts, Inc. 5008 Airport Road Roanoke, VA 24012

Direct 540-561-8351 Kevin,Green@Advance-auto.com



LETTER OF COMMENT NO. 122

January 3, 2007

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 Advance Auto Parts and Subsidiaries, I strongly urge the Financial Accounting Standards Board to delay the effective date of FIN 48 on 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.

Sincerely

Advance Auto Parts, Inc.

Kevin Green Tax Director