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January 4, 2007



LETTER OF COMMENT NO. 68

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 Silgan Holdings Inc., 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.

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. Our experience so far has been that there is a wide degree of interpretation between the attest firms as to the appropriate level of inquiry that FIN 48 requires, including whether a "top down" approach starting with known and obvious exposures is sufficient, or whether a "bottom up" approach analyzing each line of a trial balance for potential issues is required. Further, the standards by which we are required to document management's judgment around the level of probability of various potential outcomes are not clearly defined. In addition to these fundamental issues, many smaller issues around documentation, measurement and disclosure have yet to be resolved.

We firmly believe that further guidance is required before FIN 48 can be implemented in a meaningful and uniform fashion.

Respectfully

Anthony P. Andreacchi Vice President, Tax

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