



LETTER OF COMMENT NO. 291

January 5, 2007

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

Subject: FIN 48 Accounting for Uncertainty in Income Taxes

Dear Chairman Herz:

On behalf of Watson Wyatt Worldwide, Inc., we strongly urge the Financial Accounting Standards Board to delay the effective date of FIN 48 on Accounting for Uncertainty in Income Taxes to allow the companies affected and the public accounting sector time to address the substantive procedural and documentation challenges posed by this new interpretation. Much like what this nation learned in its attempt to implement Sarbanes-Oxley section 404, companies simply cannot make meaningful changes of this magnitude without sufficient time to staff and receive counsel. As executives of a large global public company, we have seen first hand how ill-prepared this nation's public accounting experts are to advise their attest clients on this new interpretation. In our view, this new interpretation has landed in the laps of this nation's businesses with neither sufficient guidance nor the time to effectively work through and consider the issues it presents to shareholders. This fact in itself is an important message FASB should be taking very seriously and should have considered before the effective date was set. Specifically, we recommend that the effective date of FIN 48 be deferred to fiscal years beginning after December 15, 2007.

Our understanding is the challenges of implementing FIN 48 were articulated by Tax Executives Institute in a letter it sent to you on December 12, 2006 with which we can concur.

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,

Carl D. Mautz

Vice President and Chief Financial Officer

Y. Clay Ayers
Director of Tax

cc:

John J. Haley, President & CEO

John C. Wright, Director and Audit Committee Chair