## perotsystems<sup>o</sup>



Mr. Robert H. Herz Chairman, Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-5116 January 11, 2007

## Dear Chairman Herz:

On behalf of Perot Systems Corporation, I encourage the Financial Accounting Standards Board to consider delaying the effective date of FIN 48 to allow public companies sufficient time to address the substantive issues and documentation requirements either required or implied by the new interpretation.

As I'm sure you are aware, this is currently an acute shortage of experienced tax professionals in the United States due to the numerous reporting requirements recently imposed by Congress, the Securities and Exchange Commission, the Internal Revenue Service as well as by the Financial Accounting Standards Board. There simply are not sufficient resources, i.e., experience tax professionals, within industry or within public accounting to adequately implement FIN48 in 2007.

As a consequence, I suggest 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, which it sent to you on December 12, 2006.

B. Kent Derr

Corporate Tax Director

Perot Systems Corporation

JAN 11 2007 22:29 9725776497 PAGE.01

PEROT SYSTEMS J260 07 01:05 a m 01-12-2007

1 /1

## perotsystems.

9725774374

January 12, 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 Perot Systems Corporation, I encourage the Financial Accounting Standards Board to consider delaying the effective date of FIN 48 to allow public companies sufficient time to address the substantive issues and documentation requirements either required or implied by the new interpretation.

As I'm sure you are aware, this is currently an acute shortage of experienced tax professionals in the United States due to the numerous reporting requirements recently imposed by Congress, the Securities and Exchange Commission, the Internal Revenue Service as well as by the Financial Accounting Standards Board. There simply are not sufficient resources, i.e., experienced tax professionals, within industry or within public accounting to adequately implement FIN48 in 2007.

As a consequence, I suggest 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, which it sent to you on December 12, 2006.

Very truly yours,

Erin M. Pollaehn

International Tax Director Perot Systems Corporation

JAN 12 2007 08:10 9725774374 PAGE.01