tellabs

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January 8, 2007

LETTER OF COMMENT NO. 328

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 Tellabs, 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 companies sufficient time to address the substantive, procedural, and documentation challenges posed by the new interpretation. Specifically, we 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 its letter to you on December 12, 2006.

Our purpose in supporting deferral is solely to provide additional time for companies to conduct the detailed and thorough analysis necessary to comply with the provisions of FIN 48. Like many companies with calendar year-ends, Tellabs has had to address multiple priorities in the tax area over the past several months including the IRS mandated e-filing of tax returns, the filing of state tax returns, and the tax accounting for our third-quarter financial statements and SEC filings. Given these issues and the challenges of implementing FIN 48 as enumerated by the Tax Executives Institute in its letter, we believe that deferral of the effective date will enable companies to conduct more thorough and complete FIN 48 analyses, and result in greater consistency and uniformity among companies in the information provided to readers of financial statements.

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 place.

Thank you for your consideration of this request.

Respectfully,

John P. Cannova
Director of Tax

James A. Dite
Vice President and Controller