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LETTER OF COMMENT NO 354

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

Dear Mr. Herz:

The purpose of this letter is to urge the Financial Accounting Standards Board to delay the effective date of FIN 48 on *Accounting for Uncertainty in Income Taxes*. It believe that such a delay is necessary to provide the business community sufficient time to address the multitude of challenges posed by the new interpretation.

Through our own process of evaluating the new standards set forth in FIN 48, it became apparent that substantial time would be needed to identify and quantify uncertainty regarding state and international tax issues. The short time frame between when the final interpretation was released and the effective date for compliance did not adequately allow for this. Also, it is apparent that additional guidance is warranted for issues such as what constitutes adequate documentation and what is the proper form of presentation for disclosures in the financial statements.

Accordingly, I recommend that the effective date of FIN 48 be deferred to fiscal years beginning after December 15, 2007.

Best Regards

Chris Choate, CFO AmeriCredit Corp.

