Winter, Kloman, Moter & Repp, S.C.
CPAs SUPPORTING YOUR SUCCESS

September 3, 2008

LETTER OF COMMENT NO. 10

Mr. Robert Herz, Chairman
Financial Accounting Standards Board
401 Merritt 7
Norwalk, CT 06856

Re: FASB Interpretation No. 48, Accounting for Uncertainty in Income Taxes

Dear Mr. Herz,

I am writing you on behalf of our firm, Winter, Kloman, Moter, Repp, S.C., to let you know that we support the recommendation of the Private Company Financial Reporting Committee relative to exempting private companies from all of the requirements of FIN 48 (copy of PCFRC letter enclosed).

While we believe the majority, if not all, of the closely-held client companies we serve would not be materially impacted by the requirements of FIN 48, the costs of implementing its requirements would be significant and difficult to explain to our clients as to why these additional costs are being incurred. As the enclosed copy of the PCFRC letter indicates, we also concur that the users of the financial statements of our closely held companies (i.e. banks, sureties, owners, etc.) would not be getting any new pertinent and meaningful information required under FIN 48 to assist them in evaluating their decisions relative to this entity.

In conclusion, we appreciate your consideration relative to PCFRC's recommendation to exempt private companies from the requirements of FIN 48 and want to again reiterate our support of this recommendation.

Sincerely,

Paul R. Sehmer, Shareholder

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