SPIRIT™
AIRLINES

2800 Executive Way
Miramar, FL 33025
Phone: 954.447.7965
Fax: 954.447.7979
spiritair.com

January 8, 2007

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

LETTER OF COMMENT NO. 405

Dear Chairman Herz:

On behalf of Spirit Airlines, Inc. (Spirit) 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 have been articulated by Tax Executives Institute in a letter it sent to you on December 12, 2006.

The implementation of FIN 48 is particularly burdensome to small non-public companies such as Spirit. Companies such as ours have very limited resources, which are more than fully committed at this time. This is especially true since the current time frame for implementation of FIN 48 is so short. A longer implementation period would allow for more in depth analysis with the goal of heightened financial statement accuracy.

In summary, extending the deadline for implementing FIN 48 will permit companies and their independent auditors to resolve the many 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,

John R. Severson
EVP and CFO

Barbara J. Schreck
VP Corporate Tax Counsel

Ref. 2007-1