MOSS-ADAMS LLP

CERTIFIED PUBLIC ACCOUNTANTS | BUSINESS CONSULTANTS

www.mossadams.com

LETTER OF COMMENT NO. 36

T 206-302 6800
F 206-652-2098

January 18, 2008

Mr. Russell G. Golden
Director of Technical Application and Implementation Activities
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

RE: Proposed FSP No. FIN 48-b

Dear Mr. Golden:

Moss Adams LLP appreciates the opportunity to respond to the proposed FASB Staff Position ("FSP") that would provide an extended period of time for nonpublic enterprises to implement FIN 48. We applaud the Board's recognition that private companies (nonpublic enterprises) are different from public enterprises. The proposed FSP No. FIN 48-b, "Effective Date of FASB Interpretation No. 48 for Nonpublic Enterprises" has been well received by users, preparers and practitioners that focus on this very important segment of our economy.

Over the last several weeks we have seen various publications that have attempted to add unnecessary complexity to the question of whether a nonpublic enterprise has previously adopted FIN 48. We believe the proposed FSP's addition of the wording "or information to third parties" to the sentence in paragraph 22 of Interpretation 48 that discusses early adoption may be causing some of the confusion. The determination of whether an enterprise has adopted the provisions of FIN 48 should be dependent upon the specific facts and circumstances and the enterprise should be allowed to make that determination. We believe elimination of the "or information to third parties" wording would clarify the application of the proposed FSP and expand the scope of the deferral to an appropriate group of enterprises.

Alternatively, if the Board decides to provide additional clarification we would support inclusion of the concept that interim financial information released to third parties that lacked recognition, measurement, disclosure or an otherwise affirmative statement regarding the adoption of FIN 48 is a strong indicator that the enterprise did not adopt FIN 48.

A broad deferral of FIN 48 for nonpublic enterprises may provide an unintended benefit to a relatively small number of "public interest" enterprises. However, this should not outweigh the benefits of deferral that would be appropriate for the vast majority of nonpublic enterprises.

999 Third Avenue, Suite 3300
Seattle, WA 98104-4019

Regardless of the FASB's ultimate decision on the applicability of the deferral, we recommend that FSP 48-b be finalized as soon as possible to eliminate uncertainty as to the applicability of FIN 48 to calendar year end financial statements of nonpublic enterprises.

Please do not hesitate to contact Jeff Brown (206-302-6814) if you have any questions or would like to discuss our comments.

Sincerely,

Moss Adams LLP

Moss Adams LLP