



LETTER OF COMMENT NO. 228

January 10, 2007

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 Schneider Electric Holdings Inc., I strongly urge the Financial Accounting Standards Board ("FASB") 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, I 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 a letter it sent to you on December 12, 2006. 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 instance.

Further, as the economy becomes more global and more multi-national companies are preparing financial statements under both U.S. GAAP and International Financial Reporting Standards ("IFRS"), the time frame in which to prepare financial statements under these two different accounting standards, coupled with the significant additional compliance required under FIN 48, is simply too compressed. While I fully appreciate that the FASB's concern is the financial reporting under U.S. GAAP, the reality is that many U.S. companies also prepare financial statements under IFRS. Such reality can not be ignored, and postponing the FIN 48 implementation date would be viewed as a positive step towards assisting those companies which prepare financial statements under both U.S. GAAP and IFRS.

Respectfully.

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