MATRIA®
HEALTHCARE

January 10, 2007

LETTER OF COMMENT NO. 342

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 Matria Healthcare, Inc., I 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, 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. The requirements of evaluating each tax position to determine whether each position meets the "more likely than not" standard and evaluating a range of potential outcomes to determine the appropriate measurement for each position as well as creating documentation for the conclusions that will satisfy external auditors is an even more daunting task for smaller publicly traded companies with tax departments of 1 or 2 individuals.

In summary, 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.

Respectfully,

Joseph Blankenship
Vice President, Corporate Controller
Matria Healthcare, Inc.

MATRIA HEALTHCARE, INC.
1850 Parkway Place, Suite 1200 • Marietta, GA 30067 • (770) 767-4500 • Fax (770) 767-4521