



# Cleveland-Cliffs Inc

January 15, 2007

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



LETTER OF COMMENT NO. 344

Dear Mr. Herz:

On behalf of Cleveland-Cliffs Inc ("Cliffs") (NYSE: CLF), we join with other companies, associations and organizations that 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.

Cliffs, headquartered in Cleveland, Ohio is the largest producer of iron ore pellets in North America and sells the majority of its pellets to integrated steel companies in the United States and Canada. Cliffs operates a total of six iron ore mines located in Michigan, Minnesota, and Eastern Canada. Cliffs is also the majority owner (80%) of Portman Limited, the third-largest iron ore company in Australia, serving the Asian iron ore markets with direct-shipping fines and lump ore.

Specifically, we would recommend that the effective date of FIN 48 be deferred to fiscal years beginning after December 15, 2007. We know that the challenges of implementing FIN 48 have been articulated to the FASB by a number of other companies, associations and organizations (for example the letter of Tax Executives Institute sent to you on December 12, 2006 and the letter of the Manufactures Alliance / MAPI sent to you on December 21, 2006) so we will not reiterate these challenges which Cliffs and other companies face. Just note that such challenges are very real and that our continuing efforts to adopt FIN 48 represent a very significant and costly undertaking.

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. The key issue is the time required to complete analysis and organize the documentation required with respect to all open years with all jurisdictions for all Cliffs' entities.

We sincerely appreciate your consideration of our request on this very important issue.

Respectfully,

Robert J. Leroux – Vice President and Controller

Daniel P. Hayes – Tax Director