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January 4, 2007

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



LETTER OF COMMENT NO. 408

Dear Chairman Herz:

On behalf of EPIQ Systems, 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 our company 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.

As a company listed on the NASDAQ stock exchange, we will be required to conform to FIN 48 reporting requirements. I have attended several seminars presented by the top national accounting firms. In every instance, the presenters (who have the luxury of working on FIN 48 exclusively) have provided inconsistent direction regarding what FIN 48 requires. In over twenty years of my professional tax career, I have never encountered more difficult, subjective and challenging compliance requirement as FIN 48. The increased burden on the tax department is exponentially more than what was ever required under Sarbanes-Oxley.

In particular, the documentation evidencing support of the amount recorded for the unrecognized tax benefit (i.e., the largest amount of tax benefit that is greater than 50 percent likely of being realized upon ultimate settlement with the relevant taxing authority) requires multiple analysis of each tax position that reaches the more likely than not recognition threshold. While we understand the purpose, effective implementation takes considerable time. These undertakings have the practical effect of diminishing the time we have to interpret and execute the already complex income tax accounting requirements.

In summary, extending the deadline for implementing FIN 48 will permit EPIQ and its independent auditor time to resolve unanswered questions and thus reduce the likelihood of diversity in practice, which in part prompted the development of FIN 48.

Please feel free to contact me if you would like to discuss this matter further.

Respectfully.

Philip M. Burright

Director, Corporate Tax EPIQ Systems, Inc.

Cc Elizabeth Braham, CFO

Doug Fleming, Director, Corporate Accounting