

# ResCare

10140 Linn Station Road  
Louisville, Kentucky 40223-3813

phone: 502.394.2100

fax: 502.394.2353



LETTER OF COMMENT NO. 116

January 4, 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 Res-Care, 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.

Even though implementation is imminent, Res-Care, Inc. is ill prepared to effectively implement FIN 48 at this time. Guidance has been confusing and slow in coming and the magnitude of the analysis required is significant. We will do what is necessary and will complete the task with a detailed and thoughtful approach, regardless of the implementation date, but additional guidance and a delay in the effective date would be very beneficial to our process.

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,

Charles G. Radway  
Vice President of Taxation

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