



Omya Industries Inc.

61 Main Street
Proctor, VT 05765

Tel: (802) 459-3311

www.omya-na.com

LETTER TO FASB CHAIRMAN HERZ SUPPORTING FIN 48 DELAY

January 5, 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. 152

Dear Chairman Herz:

On behalf of Omya Industries Inc. & Subsidiaries, 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 the Tax Executives Institute in a letter it sent to you on December 12, 2006.

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,

Joann Janssen
Manager – Tax Reporting & Analysis
Omya Industries Inc. & Subsidiaries



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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,

A handwritten signature in black ink, reading "Robert D. Cavanaugh". The signature is written in a cursive, flowing style.

Robert D. Cavanaugh
Treasurer
Omya Industries Inc. & Subsidiaries