



Mr. Robert H. Herz Chairman, Financial Accounting Standards Board 401 Merritt 7 P.O. Box 5116 Norwalk, CT 06856-511

January 3, 2007

## Dear Chairman Herz:

On behalf of The Warranty Group, 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 delayed, for one year, 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 and I completely endorse their reasoning.

In summary, extending the deadline for implementing FIN 48 will permit companies, like mine, and their independent auditors to resolve many unanswered questions and thus reduce the of diversity in practice, which in part prompted the development of FIN 48 in the first instance. It will also reduce the likelihood errors and restatements.

I appreciate your consideration in this matter. You may call me at (847)953-1187 if you have any questions.

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Sincerely

Kenneth E. Owens
Vice President – Taxes
TWG Holdings, Inc.

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