Rayonier

Corporate Headquarters

Hans E. Vanden Noort Sr. Vice President and Chief Accounting Officer

January 8, 2007



LETTER OF COMMENT NO. 34

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

Dear Mr. Herz:

We are writing to express our full support for the views set forth in the December 12, 2006 letter to you from the Tax Executives Institute urging a one-year delay in the effective date of the Financial Accounting Standards Board's ("FASB's") Interpretation No. 48, Accounting for Uncertainty in Income Taxes ("FIN 48") to allow sufficient time to address the substantive, procedural, and documentation challenges posed by the new interpretation.

Addressing the challenges posed by FIN 48 requires a substantial undertaking. This effort, while valuable to the investment community for transparency purposes, would be better served after more time is allowed for a thorough analysis of the implementation issues required by the new interpretation and the specific facts of each company. Further, the interpretation of the documentation requirements seems to vary among the major audit firms and those required to adopt FIN 48. We believe that additional implementation guidance is necessary from FASB to clarify the pronouncement's application to complex tax issues, and this proposed delay will allow the necessary time for such guidance.

Very truly yours,

cc: Scott D. Winer

1LE Ventor