

Toyoda Gosei North America Corporation

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LETTER OF COMMENT NO. 163

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 Toyoda Gosei North America, 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. Our company has great difficulty grasping the requirements of the Standard as it relates to our state income tax filings (we file in 7 different states as a group, totaling 15 different returns). Also we have an ongoing Federal issue that is scheduled for Tax Court in May 2007. That is only the beginning of our difficulties in adhering to this standard and adopting it for our 2007 financial statements. Some other challenges of implementing FIN 48 were articulated by 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 our companies, eight in number, and our 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,

Bradley Towers

Tax Manager, Toyoda Gosei North America Corporation

Bridley / come