JDA

JDA SOFTWARE GROUP, INC.

LETTER OF COMMENT NO. 191

WORLD
HEADQUARTERS
14400 NORTH
87TH STREET
SCOTTSDALE, AZ
85260-3649

VOICE
480.308.3000
FACSIMILE
480 308.3001

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January 3, 2007

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

Dear Chairman Herz:

On behalf of JDA Software 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 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.

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,

Dave Alberty
Vice President, Tax and International Accounting
JDA Software Group, Inc.