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January 3, 2007

LETTER OF COMMENT NO. 74

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 Urban Outfitters, 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.

As the lead tax professional for my company, I am extremely concerned about the scope of the new guidance and whether or not we have sufficient time and resources to analyze and address all of the reporting issues surrounding FIN 48, as well as the development and documentation of appropriate internal controls to ensure compliance with Section 404. My department has conscientiously begun the process of engaging our tax advisors and Independent Registered Public Accounting Firm ("Auditors") to assist us with the implementation of FIN 48 but we continually receive inadequate guidance and ambiguous responses to both our procedural and analytical questions. We have also attended several training sessions sponsored by various professional organizations and again have been faced with contradictory answers or unanswered questions. It seems that the auditing firms are no more prepared to opine on FIN 48 as public companies are to comply with its requirements.

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,

Kirsten Comley
Senior Tax Manager
Urban Outfitters, Inc.