



January 8, 2007

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



LETTER OF COMMENT NO. 262

Dear Chairman Herz:

On behalf of Pediatrix Medical Group, 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.

Mr. Russell Golden, at the Tax Executives Institute's conference in November 2006, stated that the Board had not received much commentary regarding FIN 48 after it was issued. As one member at that conference pointed out, the lack of commentary was likely due to the corporate tax department cycle. When FIN 48 was released in July 2006, our company was in the midst of preparing returns and complying with the new e-filing requirement. After the corporate federal and state returns were filed, the company was then in the midst of third quarter financial reporting.

Since the end of the third quarter, our company has been working to understand the requirements of FIN 48, gather the necessary documentation, and resolve open issues related to its implementation. Now as we enter our year end processes of financial reporting and tax compliance, we are finding that the amount of time provided by the FASB is not adequate.

While we support the FASB's objective of bringing greater clarity to the accounting for uncertain income tax positions, we have not been provided enough time to document the necessary analysis that this interpretation requires.

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,

Lee Ann Steinberg Vice President of Tax Karl B. Wagner

Chief Financial Officer