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

LETTER OF COMMENT NO. 279

## Dear Chairman Herz:

On behalf of Bridgestone Americas Holding, 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.

We have found that there is an unprecedented level of confusion with FIN 48 on numerous fronts. Our auditors and advisors cannot define a level of materiality that should properly serve to limit scope of implementation. While I understand materiality is subjective to some degree there appears to be a "frozen fear" of stopping short of looking at every conceivable jurisdiction at every conceivable construction of issues and non issues. In a multinational environment this has translated into moving in a circle at a faster and faster pace with negligible progress. FIN 48 has created an incredible resource drain before we put the first analysis on paper. If for no other reason a practical dialogue between FASB and the "Big Four" should proceed in the next few months to place a practical frame around the intended purpose of FIN 48 materiality.

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,

John R. Zeno

John R. Zeno

Federal Tax Manager

Bridgestone Americas Holding, Inc.