

**PLAYBOY ENTERPRISES, INC.**



LETTER OF COMMENT NO. 349

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 Playboy Enterprises, 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.

Although, Playboy Enterprises, Inc. supports completely the efforts of the FASB to bring about clarity and consistency with respect to all tax positions, under the guidance provided by FIN 48 there remain a significant number of questions and ambiguities in the implementation and application of the FASB interpretation. In addition, the short period of time since the release of FIN 48 will only serve to increase the risk of inadvertent non-compliance despite our best efforts and our advisors. Additional time will only serve the best interest of the financial statement users in bringing about a consistent application of the interpretation, as well as, allow us time to set in motion controls and processes to meet the objectives of FIN 48.

Playboy Enterprises, Inc. strongly recommends that the FASB defer the effective date of FIN 48 to fiscal years beginning after December 15, 2007 to allow time for a more systematic and carefully controlled implementation of FIN 48.

We appreciate the FASB's consideration of this matter and would welcome the opportunity to discuss this important issue further with members of the Board and its staff.

Yours truly,

G. E. Kyroudis

Senior Tax Director  
Playboy Enterprises, Inc.