



**SIGMA-ALDRICH**

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January 5, 2006

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



LETTER OF COMMENT NO. 324

Re: *Proposal to Delay Effective Date for FIN 48*

Dear Chairman Herz:

On behalf of Sigma-Aldrich Corporation, I would like to strongly urge the Financial Accounting Standards Board (FASB) to delay the effective date of FIN 48 to fiscal years beginning after December 15, 2007.

Our corporation supports every effort to ensure that companies fairly present their financial position in financial statements prepared for investors and in documents filed with the Securities and Exchange Commission. However, we feel that the current timeframe and significant remaining uncertainty in interpretation by both Sigma-Aldrich and our outside auditors place a significant and undue burden on our company.

As outlined in the Tax Executives Institute letter dated December 12, 2006 to the FASB, FIN48 requires companies to analyze their entire inventory of tax positions-claimed and unclaimed-in every jurisdiction, for every tax authority, and for every open tax year in order to understand and document the company's position at the effective date. This burden is tantamount to, and as challenging as, re-filing an income tax return in every jurisdiction for every open tax year. In the case of Sigma-Aldrich, this requires communication with and tax law analysis in 35 different countries, not including the various jurisdictional returns within each country. As you know, FIN 48 was finally released on July 13, 2006, which only allowed companies six months to complete the analysis outlined above and to gain a full understanding of the complex reporting requirements required therein.

In addition, Sigma-Aldrich has concerns with the broad and ambiguous reporting requirements created under FIN48. We have spoken with and read documentation from each of the Big 4 accounting firms and received varying answers to key questions on the new documentation requirements. It is clear that the stated goal of consistently and informational value to shareholders will not be met based on the various interpretations currently being followed and advised to clients. Without sufficient time to review and reach consistency as to the application of FIN48, we believe the current deadline will impede, rather than advance, the objective of providing investors, regulators, and the capital markets appropriate financial statement information about our tax positions.

Sigma-Aldrich is a leading Life Science and High Technology company. Our biochemical and organic chemical products and kits are used in scientific and genomic research, biotechnology, pharmaceutical development, and diagnosis of disease and as key components in pharmaceutical and other high technology manufacturing. Currently, we have operations in 35 countries and 7,300 employees providing service to customers worldwide.

I appreciate the opportunity to provide comments on this matter. I can be reached at (314) 286-7764 if there are questions or comments.

Regards,

A handwritten signature in black ink, appearing to read "Chris Carril", written in a cursive style.

Christopher Carril  
Manager, Corporate Income Taxes