

Navistar International Corporation 2701 Navistar Drive Lisle, IL 60532 USA (331)-332-5000

W: navistar.com

Richard Tarapchak
VP & Corporate Controller

April 22, 2013

Technical Director
File Reference No. EITF-13C
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116
Via email: director@fasb.org

Re: Proposed ASU - Presentation of an Unrecognized Tax Benefit When a Net Operating Loss Carryforward or Tax Credit Carryforward Exists

Navistar International Corporation ("Navistar" or "we") wishes to offer its comments on the Financial Accounting Standards Board's (the "Board") proposed update to Topic 740 "Income Taxes" (the "Exposure Draft"). Navistar appreciates the Board's objective to reduce diversity in practice as it relates to the presentation of unrecognized tax benefits. Navistar (NYSE: NAV), is the nation's largest combined commercial truck, school bus and mid-range diesel engine producer.

Question 1: Do you agree with the proposed approach for the presentation in the statement of financial position of unrecognized tax benefits when net operating loss carryforwards or tax credit carryforwards exist? If not, what approach do you prefer and why?

Yes, we agree with the proposed approach presented in the Exposure Draft.

Question 2: Do you agree that no new recurring disclosures about the presentation of unrecognized tax benefits should be required? If not, what disclosures would be appropriate?

Yes, we agree that no new recurring disclosures should be required.

Question 3: Do you agree that the proposed Update should be adopted retrospectively? If not, why not?

No, we do not agree that the proposed Update should be adopted retrospectively. This requirement would impose increased burden and costs in transition which we believe would be substantially disproportionate to any benefit received by financial statement users.

Question 4: For preparers, how much time is necessary to implement the proposed Update? Should the effective date for public and nonpublic entities be the same? If not, why not?

Apart from the proposed retrospective adoption approach, we do not expect the implementation to require an extended period of time. However, a retrospective adoption requirement would necessitate additional analysis at each point in time for those periods presented in the financial statements. We have not specifically quantified the time required to perform a retrospective adoption but would envision significant complexities and time in completing such analysis.

Thank you for considering our comments. If requested, we would be pleased to discuss our comments with you at any time.

Sincerely,

Richard Tarapchak

VP & Corporate Controller

Mith Targetel