



LETTER OF COMMENT NO. 382

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

January 5, 2007

Dear Chairman Herz:

On behalf of Fossil, I would like to express my hope that the Financial Accounting Standards Board will delay the effective date of FIN 48 on Accounting for Uncertainty in Income Taxes to allow the Board time to revisit the criteria for recognition and measurement of tax benefits that, I fear, will force companies to overstate their tax liabilities or worse, potentially cause an unfavorable outcome in a tax audit due to the detailed nature of the disclosures required. Even if the Board decides to leave the Interpretation as it currently reads, a delay in the effective date to fiscal years beginning after December 15, 2007 would allow companies sufficient time to address the substantive, procedural, and documentation challenges posed by the new interpretation.

Please give consideration to extending the deadline for implementing FIN 48 to permit companies and their independent auditors sufficient time to resolve unanswered questions and to perform the extensive analysis required by the Interpretation.

Sincerely.

Micia Wagnen Alicia Wagoner

V.P., Tax