CHS

April 9, 2009

Florence E. Harmon
Acting Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

COMMUNITY HEALTH SYSTEMS

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Re: Comments on Proposed IFRS Roadmap (File Reference No. S7-27-08)

Dear Ms. Harmon:

Community Health Systems, Inc. ("CHS") welcomes this opportunity to respond to the request for comments from the Securities and Exchange Commission on the Proposed Roadmap for the Potential Use of Financial Statements Prepared in Accordance With International Financial Reporting Standards by U.S. Issuers ("Proposed Rule" or "Roadmap").

CHS is the largest publicly traded operator of hospitals in the Unites States in terms of number of hospitals and net operating revenues. We provide a broad range of general and specialized hospital healthcare services to patients through the 120 hospitals that we own or lease. Our hospitals are geographically diversified across 29 states.

We understand that if the milestones noted in the Roadmap were to be achieved, then U.S. Issuers would be required to use IFRS beginning in 2014. We support the Commission's efforts to develop high-quality standards that improve the transparency, usefulness and credibility of financial reporting. However, we believe there are five fundamental issues with the current proposal: 1) a cut-over to a new set of standards will result in significant confusion on the part of the users of the financial statements, as all such users will not have received the necessary training to understand the new standards; 2) companies themselves will struggle to develop the expertise to implement an entirely new set of standards which will inherently weaken the control environment as fewer individuals within a company will be sufficiently trained to be able to identify and correct accounting misstatements; 3) auditors/accounting firms will struggle to accept divergent accounting practices among clients and/or peer companies; 4) the move to a more principles based approach is culturally incompatible with the legal system, taxing authorities and regulatory agencies in the Unites States; and 5) companies will incur significant costs in planning for and implementing IFRS with little or no tangible benefit during a time when the economy is weak.

The following sections highlight the above listed concerns in greater detail.

1. Confusion on the part of Stakeholders

The primary users of our financial statements are investors, shareholders, creditors, analysts and regulatory agencies. In the course of our interaction with these stakeholders they have not made us aware of their having any interest or receiving any benefit from a convergence to IFRS. Furthermore, our business is entirely domestic and by the very nature of the healthcare industry we do not compete against nor is our financial performance measured against foreign providers of healthcare services.

Other users of our financial information include federal and state agencies from which we receive payment on behalf of our patients who are covered by government sponsored programs such as Medicare and Medicaid. In certain instances our expenses are used by these agencies in determining the amount paid to us. It is unknown at this time how these agencies will mange the transition to IFRS, but we believe it is unlikely these agencies will simultaneously change their regulations to correspond to the timing of the planned transition to IFRS. This could result in situations where companies are required to maintain duplicate financial reporting systems, creating an inherently inefficient and costly system.

2. Companies will struggle to develop the expertise

The burden of transitioning to IFRS will primarily fall on a relatively small group of accounting professionals within a company and, in most instances, resources will need diverted from other projects or external resources obtained to accomplish this task. These same individuals also commonly occupy positions which are critical to a company's internal control structure. We are concerned the concentration of these efforts on this small group will significantly increase the risk of accounting errors and misstatements going undetected during this transition period. Additionally, as with most companies, certain of our internal controls exist outside the traditional accounting area and are performed by individuals who are not accounting professionals. Although many of the individuals carrying out these controls have significant experience within their own area of expertise, sweeping changes in accounting practices could significantly reduce their overall effectiveness within the control environment.

3. Diversity in accounting practices

We are concerned about the ability of both our stakeholders and the accounting firms to absorb the more principles-based approach of IFRS and the potential for diversity in accounting practices. We are further concerned that a move to IFRS may result in each of the accounting firms adopting their own interpretive guidance in an effort to manage their audit quality and reduce their professional risk. The consequence of such actions could result in inconsistencies in the application of IFRS between the accounting firms, while limiting the ability of individual companies to apply a principles-based approach to a particular transaction.

Considering that a high quality and transparent system of financial reporting already exists within the United States, we do not believe that a transition to IFRS and the probability of creating additional diversity in practice represents an improvement over the current financial reporting system.

4. Inconsistent with taxing, legal and regulatory authorities

Although we fully support the concept of a principles-based system of accounting, we believe it conflicts directly with the existing business, legal and regulatory environment in which all U.S. based companies operate. Over the past decade, this environment has resulted in the issuance of a preponderance of new rules-based guidance in U.S. GAAP, resulting in the migration of a formerly principles-based accounting system to one that has become largely rules based. Even today, as we discuss a planned transition to IFRS, there fails to be a consensus on how principles, such as fair value accounting, should be applied and our standard setting bodies continue to be pressed to issue more rules and bright line guidance. Adopting IFRS will not change the environment in which companies operate and, as experience has proven, this environment has dictated the necessity for a more rules-based system of accounting. We remain very concerned as to how the rules-based legal, tax and healthcare reimbursement systems in the U.S. will interpret IFRS and of the unintended consequences, including resulting litigation, that could be created from this transition. We believe certain safe harbor provisions should be considered in connection any mandated transition to IFRS.

Furthermore, we do not believe that the Roadmap sufficiently addresses how the SEC plans to work with its counterparts in the International Organization of Securities Commissions in eliminating differences among the securities laws in various jurisdictions around the world. These views echo what has been previously expressed by numerous others, including the Committee on Corporate Reporting ("CCR") of Financial Executives International ('FEI").

5. **Costs related to the implementation of IFRS in the current economic environment**

The current economic environment has had a serious effect on our business as well as many others and has forced us to make difficult decisions regarding our corporate strategy. Our top priorities into the foreseeable future are providing quality healthcare services while running our business as efficiently and effectively as possible in order to maximize shareholder value. We believe there is little or no return on investment for the costs incurred to implement IFRS and accordingly, we believe this would be a misuse of our corporate resources. Our stakeholders would be better served with those funds invested in improving the profitability of our business.

Thank you for the opportunity to provide comments on the Proposed Rule. We would be pleased to discuss further our views with you at your convenience.

Sincerely,

/s/ W. Larry Cash
W. Larry Cash
Executive Vice President & Chief Financial Officer

/s/ T. Mark Buford
T. Mark Buford
Vice President & Chief Accounting Officer

/s/ Kevin J. Hammons
Kevin J. Hammons
Vice President, Financial Reporting