

Mr Robert Garnett
Chairman
International Financial Reporting Interpretations Committee
30 Cannon Street
London
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Email: ifric@iasb.org

18 December 2009

Dear Mr Garnett,

Tentative agenda decision: IFRS 2 Share-based Payment - Transactions in which the manner of settlement is contingent of future events

Deloitte Touche Tohmatsu is pleased to respond to the IFRIC's publication in the November 2009 IFRIC Update of the tentative decision not to take onto the IFRIC's agenda a request for an Interpretation of IFRS 2 *Share-based Payment* with respect to providing guidance on treatment of transactions in which the manner of settlement is contingent of future events.

We disagree with the IFRIC's decision not to take this item onto its agenda. We believe that the IFRIC should use its mandate enlarged by the IASB and propose guidance on treatment of IFRS 2 transactions in which the manner of settlement is contingent on future events as part of the annual improvements process. We believe that the issue is sufficiently narrow in scope to be addressed within the remits of the annual improvements process rather than as part of a post-implementation review of IFRS 2: that might delay addressing the issue by several years.

If you have any questions concerning our comments, please contact Ken Wild in London at +44 (0)20 7007 0907.

Yours sincerely,



Ken Wild
Global IFRS Leader