

Sir David Tweedie  
Chairman  
International Accounting Standards Board  
30 Cannon Street  
London  
United Kingdom  
EC4M 6XH

Email: [commentletters@iasb.org](mailto:commentletters@iasb.org)

24 November 2010

Dear Sir David,

**Re: Exposure Draft ED/2010/12 *Severe Hyperinflation (proposed amendment to IFRS 1)***

Deloitte Touche Tohmatsu Limited is pleased to comment on the International Accounting Standards Board's (the Board's) Exposure Draft ED/2010/12 *Severe Hyperinflation* (proposed amendment to IFRS 1) (referred to in this letter as the 'ED').

Whilst we do not object to the proposed amendments to IFRS 1 *First-time Adoption of International Financial Reporting Standards*, we would have preferred the Board not to take up this narrow issue that is relevant only for a particular jurisdiction at a time when the Board is under tremendous pressure to complete many of its major projects by June 2011. The accounting issues around financial reporting in hyperinflationary economies are numerous and are not limited to those issues that the Board is attempting to address in the ED. Our experience indicates that jurisdictions are struggling with applying many aspects of IAS 29 *Financial Reporting in Hyperinflationary Economies* in its current form. Therefore, we recommend that the Board considers including a comprehensive review of IAS 29 in its post-2011 agenda.

If you have any questions concerning our comments, please contact Veronica Poole in London at +44 (0) 207 007 0884.

Sincerely,



Veronica Poole  
Global Managing Director  
IFRS Technical