

Mr Wayne Upton
Chairman
International Financial Reporting Interpretations Committee
30 Cannon Street
London
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Email: ifric@ifrs.org

15 August 2011

Dear Mr Upton,

Tentative agenda decision: IFRS 3: Business Combinations – Acquirer in a reverse acquisition

Deloitte Touche Tohmatsu Limited is pleased to respond to the IFRS Interpretation Committee's publication in the July 2011 *IFRIC Update* of the tentative decision not to take onto the IFRIC's agenda requests for Interpretations of IFRS 3, *Business Combinations*, with respect to providing guidance on whether a business that is not a legal entity could be considered to be the acquirer in a reverse acquisition under IFRS 3.

We agree with the IFRS Interpretations Committee's decision not to add this item onto its agenda for the reasons set out in the tentative agenda decisions.

If you have any questions concerning our comments, please contact Veronica Poole in London at +44 (0)20 7007 0884.

Yours sincerely,



Veronica Poole
Global Managing Director
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