

December 18, 2007

Mr. Jim Sylph
Executive Director, Professional Standards
International Federation of Accountants
545 Fifth Avenue, 14th Floor
New York, NY 10017

Dear Mr. Sylph:

We appreciate this opportunity to comment on the Consultation Paper, Proposed Strategy for 2009-2011 (the “proposed strategy”) as developed by the International Auditing and Assurance Standards Board (IAASB).

We are highly supportive of the development of a strategic plan to prioritize and guide the activities of the IAASB, and commend the IAASB for the extensive and comprehensive consultation process undertaken to develop such plan. We are also supportive of the “two-year moratorium” on the effective dates of new standards. This will provide the time needed to focus on effective implementation of the clarified standards without unnecessary distractions.

Below you will find our responses to the specific questions posed in the Consultation Paper.

RESPONSES TO QUESTIONS IN THE CONSULTATION PAPER:

1. *Within the broader strategic initiatives, is a focus on the following appropriate: (i) the world’s capital markets, (ii) the implementation of standards, and (iii) the needs of SMEs?*

Yes, we believe that the three items above form an appropriate focus.

2. *Is the list of possible actions complete? How should those actions be prioritized?*

Yes, we believe the list of possible actions is complete.

Of the possible actions listed in paragraph 13 of the proposed strategy, we believe the following should be given the highest priority:

- Develop guidance for auditors on the approach to be followed when XBRL financial statements are to be filed together with an auditor’s report.

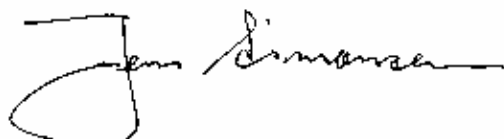
- Monitor developments related to other potential services related to XBRL which may be provided by auditors, and assess the need for additional guidance on such.
- Revise ISA 720, Other Information in Documents Containing Audited Financial Statements, to include information related to electronic information and information contained on websites.
- Conduct research on ISA 700, The Independent Auditor's Report on a Complete Set of General Purpose Financial Statements, and revise as necessary to obtain greater adoption of ISA 700 around the world.
- Revise ISAE 3400, The Examination of Prospective Financial Information, to address reporting on pro forma information, prospective financial information, and the auditor's involvement in prospectuses.
- Develop an international pronouncement on sustainability reporting, as many practitioners are issuing such reports without any guidance, thus leading to inconsistency in procedures performed and reporting delivered.
- Publish with each new standard a short note or PowerPoint slides summarizing the key changes introduced, the reasons behind those changes, and the intended effect on the engagement. This will greatly assist in delivering a consistent message around the world for training and development purposes.

3. *How should additional suggested actions be prioritized?*

We have no additional suggestions. We believe the list above is sufficient and thorough.

We would be pleased to discuss our letter with you or your staff at your convenience. If you have any questions, please contact Jens Simonsen, Director of Global Audit Services at + 1 212 492 3689 or John Fogarty, Chairman – DTT Assurance Technical Policies and Methodologies Group at + 1 203 761 3227.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jens Simonsen". The signature is written in a cursive style with a large, looped initial "J".