

Sir David Tweedie  
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By email: [iasb@iasb.org](mailto:iasb@iasb.org)

20 April 2009

Dear David

### **Request for Views on proposed FASB Amendments to the financial instruments standards**

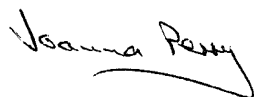
The Financial Reporting Standards Board (FRSB) of the New Zealand Institute of Chartered Accountants is pleased to comment on the International Accounting Standards Board (IASB) Request for Views on proposed US Financial Accounting Standards Board (FASB) Amendments to the financial instruments standards. For the reasons noted below, the FRSB is not commenting on the merits or otherwise of the FASB's proposed amendments to US generally accepted accounting principles (US GAAP).

The FRSB does not agree with making piecemeal changes to the financial instruments standards and, consequently, does not support the IASB following the FASB's example and making similar amendments to International Financial Reporting Standards (IFRSs). As noted in the Introduction and Concluding Comments in the Request for Views as well as your release of 7 April, while broad convergence of IFRSs and US GAAP is of key importance, this should be achieved through a comprehensive approach to improving the reporting for financial instruments. The FRSB supports the development of such a comprehensive approach as a matter of urgency. Given that consideration of the FASB proposals would entail substantial changes to IFRSs and significantly delay the comprehensive joint IASB/FASB project to improve the reporting for financial instruments, the FRSB does not support the IASB pursuing such a step at the expense of the more comprehensive project.

The FRSB considers that all available staff resources would be needed if the IASB and the FASB's desire to produce a new and improved financial instruments standard is to be fulfilled. In the FRSB's view, dedicating the necessary staff resource to extensive revisions of the existing financial instruments standards in order to align IFRSs with US GAAP on the specific issues addressed by the FASB Staff Positions will unnecessarily delay necessary improvements to the financial instruments standards.

We look forward to working with you to achieving as many improvements to the financial instruments standards as is possible within the six month timeframe proposed in your release of 7 April.

Yours sincerely



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