

GROUP OF 100 Inc.

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The Group of 100 is an association of senior accounting and finance executives representing the major public companies and government owned enterprises in Australia.

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International Accounting Standards Board
30 Cannon Street
London, EC4M 6XH
UNITED KINGDOM

Dear Sir

Invitation to Comment: Preface to International Financial Reporting Standards

The Group of 100, an organisation which represents Australia's senior finance executives from major private and public business enterprises, is pleased to respond to the Invitation to Comment.

Our comments are set out below:

Question 1

The G100 believes that the scope and focus of the IASB's activities should be on general purpose financial reports for all profit-oriented entities. The possibility of the use of IFRSs by other entities should not influence the development of requirements in respect of profit-oriented entities. Whether IFRSs are useful and relevant for other types of entities is for those entities to determine.

Question 2

The G100 supports the proposal that only one print style be used in IFRSs and to include detailed Basis for Conclusions in each standard. We believe that the adoption of one print style will clarify the authority of text and will also impose a greater discipline in the drafting process to ensure clarity of the requirement.

Question 3

The G100 supports the IASB's proposed due process. However, it is not clear whether the components in paragraph 19(a)-(i) are intended to be sequential. The G100 strongly supports conducting field tests and, on several occasions, has arranged for its members to participate in field tests for the IASC and AASB. We believe that different types of field testing may be appropriate at different stages of the due process and to wait until after the consideration of comments on an exposure draft may be too late in the due process.

We suggest that the IASB consider redrafting paragraph 19 so that the essential steps in the due process are specified separately for the other components that may be applied to varying extents from project to project.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Tom Pockett', written in a cursive style.

Tom Pockett
National President

c.c. Mr K. Alfredson
Chairman AASB

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