

International Accounting Standards Board
30 Cannon Street
London EC4M 6XH
UK

Cc: EFRAG

Oslo, September 23rd, 2011

Dear Sir/Madam

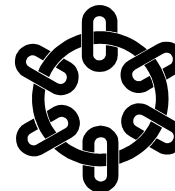
ED/2011/3: Mandatory Effective Date of IFRS 9

Norsk RegnskapsStiftelse (the Norwegian Accounting Standards Board) is pleased to comment on the Exposure Draft on *ED/2011/3: Mandatory Effective Date of IFRS 9*.

We support the proposals. Our replies to the questions are set out in the appendix to this letter.

Yours faithfully,
Norsk RegnskapsStiftelse

Erlend Kvaal
Chairman of the Technical Committee on IFRS of Norsk RegnskapsStiftelse



Appendix

Question 1

The Board proposes to amend IFRS 9 (2009) and IFRS 9 (2010) so that entities would be required to apply them for annual periods beginning on or after 1 January 2015. Do you agree? Why or why not? If not, what alternative do you propose?

We welcome the Board's decision to postpone the effective date of IFRS 9. We support the policy of IASB that a large project like this should have an implementation period of minimum 12-18 months from the date the last phase of IFRS 9 is published.

Question 2

The Board proposes not to change the requirement in IFRS 9 for comparatives to be presented for entities that initially apply IFRS 9 for reporting periods beginning on or after 1 January 2012. Do you agree? Why or why not? If not, what alternative do you propose?

We agree.