

January 22, 2009

International Accounting Standards Board
30 Cannon Street
London EC4M 6XH
United Kingdom

Dear Sirs:

IASB Exposure Draft, Additional Exemptions for First-time Adopters (proposed amendments to IFRS 1 *First-time Adoption of International Financial Reporting Standards*)

The Canadian Accounting Standards Board (AcSB) strongly supports the amendments to IFRS 1 proposed in the IASB's September 2008 Exposure Draft on this topic.

AcSB staff suggested the relief contained in these proposals after consulting with publicly accountable enterprises in Canada, and others internationally, on issues likely to impede the adoption of IFRSs. Full cost accounting and capitalization of a regulator-approved imputed cost of equity as part of the cost of certain items of property, plant and equipment are practices widely used in North America's oil and gas and rate-regulated industries, respectively. As explained in the Exposure Draft, the proposed amendments would significantly reduce the otherwise excessive costs of conversion for affected entities, with little or no sacrifice in benefits to financial statement users. This is consistent with a stated objective of IFRS 1, and with the exemptions already provided in that standard.

The AcSB encourages the IASB to promptly finalize these proposals so that entities adopting IFRSs in the near future have clear direction as they undertake their transition planning.

On behalf of the Board,



Paul G. Cherry
Chair, Accounting Standards Board