

**Consiglio Nazionale Dottori Commercialisti  
Consiglio Nazionale Ragionieri  
Commissione per i Principi Contabili**

**CL 24**

Rome, May 2005

Sir David Tweedie  
Chairman  
International Accounting Standards Board  
30 Cannon Street, 1st floor  
GB – LONDON EC4M 6XH

Email: [commentletters@iasb.org.uk](mailto:commentletters@iasb.org.uk)

Re: comment letter on Exposure draft of proposed amendments to IFRS 6 and IFRS 1.

Dear Sir David Tweedie,

The Italian accountancy profession represented by the Consiglio Nazionale dei Dottori Commercialisti and the Consiglio Nazionale dei Ragionieri (thereinafter “we”), is pleased to submit its comments on the IASB Exposure draft of proposed amendments to IFRS 6 and IFRS 1 issued on April 2005.

We support the IASB in its proposal to eliminate any inconsistency between the wording of IFRS 1 paragraph 36B, as added by IFRS 6, and the paragraphs BC63-BC65 of the Basis for Conclusion on IFRS 6.

We think that the IASB proposal to amend paragraph 36B of IFRS 1 succeeds in clarifying that an entity that both adopts IFRSs for the first time before 1 January 2006 and applies IFRS 6 before that date is not only exempted from providing comparative disclosures, but also from the recognition and measurement requirements of IFRS 6 for the comparative period.

We would be pleased to discuss any aspect of this letter with you.

Yours sincerely,

Antonio Tamborrino  
Presidente del Consiglio Nazionale dei  
Dottori Commercialisti

William Santorelli  
Presidente del Consiglio Nazionale dei  
Ragionieri