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Dear Ms Pryde

Strengthening the IASB's deliberative process

This is the response of Aviva plc to the improvements discussed in the IASB's consultation paper 'Strengthening the IASB's deliberative process'. As the world's seventh-largest insurance group and the largest insurer in the UK, we are pleased to have the opportunity to comment on the proposals which will have a direct impact on the development and implementation of accounting standards in the future.

We are supportive of the changes proposed by the IASB. These represent a positive move and we hope that the IASB will continue to look for ways to improve the deliberative process, especially in relation to interaction with preparers of accounts. In particular we welcome the boards' proposals to increase the extent of consultation and to improve the level of information provided externally.

We are very keen to see more field-testing, as this is essential for a full understanding of the impact of complex proposals, our experience implementing IFRS 4 has demonstrated this need. We are concerned that the proposals seem to focus on field visits rather than field-testing. Whilst these are a necessary and useful part of the process these do not take the place of full field testing. There is a risk that field-visits take place at too high a level and therefore the key issues do not get fully explored. The proposals state that field-testing will take place when appropriate, we would be interested to know what is the boards criteria for 'appropriateness' with regard to field-testing, and to which projects it might apply. We are especially keen to see field testing take place for the Phase II Insurance Contracts standard, and remain committed to the quick development of Phase II proposals to allow such field testing to take place without delaying the publication of the urgently needed standard.

Improvements to the provision of information, such as the IASB's response to major points arising from comment letters and the publication of latest proposals for standards, will significantly clarify the boards position. This will improve the ability of preparers of accounts to plan and make necessary system changes in anticipation of new standards.

We remain committed to working with the IASB and all interested parties to ensure delivery of satisfactory standards.

Yours sincerely

A handwritten signature in purple ink, appearing to read "Tim Harris", is written over a light blue horizontal line.

Tim Harris
Group Financial Reporting Director