

23 February 2007

Robert Garnett, Chairman  
International Financial Reporting Interpretations Committee  
30 Cannon Street  
London EC4M 6XH  
United Kingdom  
Email: ifric@iasb.org

Dear Bob,

**Proposed agenda decision wording: IAS 36 *Impairment of Assets*—Identifying Cash-generating Units in the Retail Industry**

Deloitte Touche Tohmatsu is pleased to respond to the IFRIC's publication in the January 2007 *IFRIC Update* of the tentative decision not to take onto the IFRIC's agenda a request for an Interpretation of IAS 36 *Impairment of Assets* with respect to whether a cash-generating unit could combine more than one individual store location, including situations in which those locations benefited from shared infrastructure, marketing and pricing policies and human resources.

We support the IFRIC's decision not to take this item to the agenda. We agree that IAS 36 paragraph 6 (and supporting guidance in paragraph 68) requires identification of CGUs on the basis of independent cash *inflows*.

If you have any questions concerning our comments, please contact Ken Wild in London at +44 (0)20 7007 0907.

Sincerely,



**Ken Wild**  
**Global IFRS Leader**

cc: Allan Cook, IFRIC