

11 December 2007

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

Dear Mr. Garnett,

Tentative agenda decision: IAS 19 *Employee Benefits* – Definition of plan assets

Deloitte Touche Tohmatsu is pleased to respond to the IFRIC's publication in the November 2007 *IFRIC Update* of the tentative decision not to take onto the IFRIC's agenda a request for an Interpretation of IAS 19 *Employee Benefits* with respect to the accounting for investment and insurance policies that are issued by an entity to a pension plan covering its own employees or the employees of another entity that is consolidated in the same group as the issuer.

We support the IFRIC's decision not to take this item to the agenda.

We concur with the analysis outlined in the tentative agenda decision. However, the submission was raised in the context of both the consolidated financial statements and the separate financial statements of the employer. At the November 2007 meeting the IFRIC considered the implications for both sets of financial statements and we therefore believe that the agenda decision should be framed in the context of both consolidated and separate financial statements.

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: Tricia O'Malley, IFRIC Coordinator