

Mr Robert Garnett
Chairman
International Financial Reporting Interpretations Committee
30 Cannon Street
London
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Email: ifric@iasb.org

14 April 2008

Dear Mr Garnett,

Tentative agenda decision: IAS 19 *Employee Benefits* - Settlements

Deloitte Touche Tohmatsu is pleased to respond to the IFRIC's publication in the March 2008 *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 treatment of some payments of benefits under a defined benefit plan as settlements.

We support the IFRIC's decision not to take the item on the agenda. We believe that the conclusion of the IFRIC, that payments arising when an existing plan provides plan participants with an option to receive a lump sum payment instead of ongoing payments at retirement are not considered to be settlements, is sound. We further concur with IFRIC's conclusion that the exercise of this option is reflected as part of the actuarial assumptions. We understand that this is established practice and share IFRIC's comment that there is little divergence in practice.

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

Yours sincerely,



Ken Wild
Global IFRS Leader