

Mr Robert Garnett  
Chairman  
International Financial Reporting Interpretations Committee  
30 Cannon Street  
London  
United Kingdom  
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**14 December 2009**

Dear Mr Garnett,

**Tentative agenda decision: IAS 18 Revenue - Receipt of a dividend of equity instruments**

Deloitte Touche Tohmatsu is pleased to respond to the IFRIC's publication in the November 2009 IFRIC Update of the tentative decision not to take onto the IFRIC's agenda a request for an Interpretation of IAS 18 *Revenue* with respect to providing guidance on treatment of receipt of a dividend of equity instruments.

We agree with the IFRIC's decision not to take the item related to the receipt of a dividend of equity instruments with no cash alternative onto its agenda for the reasons set out in the tentative agenda decision.

Nonetheless, we believe that the IFRIC should consider the request more widely and provide guidance on a situation when all ordinary shareholders are offered a dividend of treasury shares on a pro-rata basis **or** a cash dividend alternative. We think that such scenario is widespread and that there is a divergence in practice in accounting for such transactions. We therefore urge the IFRIC to reconsider its decision in relation to such a common scenario.

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