

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

12 April 2010

Dear Mr Garnett,

Tentative agenda decision: *IFRS 1 First-time Adoption of International Financial Reporting Standards*— Accounting for costs included in self-constructed assets on transition

Deloitte Touche Tohmatsu is pleased to respond to the IFRIC's publication in the March 2010 IFRIC Update of the tentative decision not to take onto the IFRIC's agenda a request for an Interpretation of IFRS 1 *First-time Adoption of International Financial Reporting Standards* with respect to capitalisation of certain costs, including actuarial gains and losses, as part of self-constructed assets on transition to IFRSs.

We agree with the IFRIC's decision not to take this item onto its agenda for the reasons set out in the tentative agenda decision.

If you have any questions concerning our comments, please contact Veronica Poole in London at +44 (0)20 7007 0884.

Yours sincerely,



Veronica Poole
Global IFRS Leader - Technical