

Rådet för finansiell rapportering

The Swedish Financial Reporting Board

RFR-rs 2008:13

Ms Tamara Oyre
IASCF Foundation
30 Cannon Street
GB-London EC4M 6XH
United Kingdom

Dear Tamara Oyre,

Re: IASCF Constitution Review

The Swedish Financial Reporting Board is responding to your invitation to comment on the proposals for the first phase of IASCF Constitution Review.

We agree that a monitoring group should be set up to establish a link between the IASCF and the relevant public institutions and that the Trustees should be accountable to the Monitoring Group. However, we are somewhat unclear as to the text under section 19 (a), which says that the Monitoring Group shall participate in appointing Trustees and to approve their appointment. If the intention is that the Monitoring Group shall appoint the Trustees, which it in our opinion should do, the text should be revised. At the same time such a clarification should not mean any reduction in the independence of the IASCF (and the IASB) in carrying out their current duties.

The Monitoring Group has a high level composition, something which we support. It is, of course, appropriate that it has an effective composition at all times and that it has a balance, also from a geographical stand point, that does not give a certain group an undue dominance.

We consider that the Trustees should increase their duties and in more detail involve themselves with the IASB agenda. Also, the Trustees should use their influence to take initiatives to ensure that documents are reexposed when significant changes would make such an action logical.

The proposal to increase the IASB to 16 members is made without any increase in the number of votes required for approval. We recommend this number to be increased. No standard should be issued without a substantial voting majority.

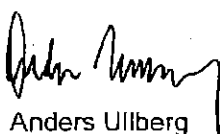
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If you have any questions concerning our comments please address our Executive member Carl-Eric Bohlin by email to: carl-eric.bohlin@radetforfinansiellrapportering.se

Stockholm, September 29, 2008

Kind regards,

THE SWEDISH FINANCIAL REPORTING BOARD



Anders Ullberg
Chairman