

Denise Silva Ferreira Juvenal

rio1042370@terra.com.br

Accountant

Individual Commentary

Rio de Janeiro / Brazil

**Sir Hans Hoogervorst Chairman of the International Accounting Standards Board
- IASB**

**Trustees of The International Financial Reporting Standards - IFRS Foundation
30 Cannon Street, London EC4M 6XH, United Kingdom.**

Tel: +44 (0)20 7246 6410 Fax: +44 (0)20 7246 6411

Email: info@ifrs.org Web: www.ifrs.org

Email: commentletters@ifrs.org

Mandatory Effective Date of IFRS 9

(proposed amendment to IFRS 9 (November 2009) and IFRS 9 (October 2010))

October 21 2011

I'm Denise Juvenal this is pleased to have the opportunity to comment on this consultation Mandatory Effective Date of IFRS 9 (proposed amendment to IFRS 9 (November 2009) and IFRS 9 (October 2010)). This is my individual commentary for the IASB's Board.

Question 1:

The Board proposes to amend IFRS 9 (2009) and IFRS 9 (2010) so that entities would be required to apply them for annual periods beginning on or after 1 January 2015. Do you agree? Why or why not? If not, what alternative do you propose?

No, I think that IFRS 9 beginning on or after 2015 is so far, in this period the IASB must be received the answers about implementation in the entities in your countries with comments about problems and impacts in the application of this IFRS.

I considering that 2013 is more adequate, I understand that occurred many modifications in this IFRS, but if IASB agree with 2015 will be have problems for implementation the new changes about this project, that includes time of IASB, IFRS Foundation, entities, auditing entities, and every cost of this project. I don't know, I think this.

Question 2:

The Board proposes not to change the requirement in IFRS 9 for comparatives to be presented for entities that initially apply IFRS 9 for reporting periods beginning on or after 1 January 2012. Do you agree? Why or why not? If not, what alternative do you propose?

I think that this situation is very different and depends of question 1, but if the IASB's change the requirement in IFRS 9 for attend in this case "the entities" this project in my observation will be occurred more difficult for your implementation and wouldn't be have continuing.

Thank you for opportunity for comments this proposal, if you have questions don't hesitate contact to me, rio1042370@terra.com.br.

Yours Sincerely,

Denise Silva Ferreira Juvenal

rio1042370@terra.com.br

552193493961