



## **REDOVISNINGSRÅDET**

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Sir David Tweedie  
International Accounting Standards Board  
30 Cannon Street  
London  
EC4M 6XH  
United Kingdom

Dear David,

We appreciate the opportunity to respond to IASB's Exposure Draft of Proposed Amendments to IAS 39 Financial Instruments: Recognition and Measurement: *Cash Flow Hedge Accounting of Forecast Intragroup Transactions*. The comments in this letter represents the views of the Swedish Financial Accounting Standards Council (SFASC).

### ***Question 1.***

*Do you agree with the proposals in this Exposure Draft? If not, why not? What changes do you propose and why?*

We support the proposal that entities should be permitted to allow a forecast intragroup transaction to be designated as the hedged item in a foreign currency cash flow hedge in consolidated financial statements.

In order to qualify for hedge accounting, we believe that there has to be an economic exposure. Therefore we support the Alternative View in the Exposure Draft.

### ***Question 2***

*Do the proposals contained in the Exposure Draft appropriately address the concerns set out in paragraph 3 of the Background on this Exposure Draft. If not, why not, and how would you address these concerns?*

We think that the concerns have been properly addressed.

### ***Question 3***

*Do you have any other comments on the proposals?*

We have no additional comments.

Stockholm 2004-10-05  
The Swedish Financial Accounting Standards Council

Dennis Svensson  
Managing Director