

14 January 2009

International Accounting Standards Board  
30 Cannon Street  
London EC 4M 6XH  
UNITED KINGDOM

[commentletters@iasb.org.uk](mailto:commentletters@iasb.org.uk)

Dear Sir/Madam

**“First-time Adoption of IFRSs”**

The Group of 100 (G100) is an organization of chief financial officers from Australia's largest business enterprises whose primary purpose is to advance Australia's financial competitiveness. The G100 is pleased to provide comments on the Exposure Draft.

On the basis of the experience of Australian companies in the transition and implementation of IFRSs, the G100 supports proposals which provide companies with practical relief to facilitate the first-time adoption. Even though Australian Accounting Standards were, in large part, harmonized with IASC Standards the process of first-time adoption revealed a number of transition issues. The G100 believes that the IASB should be facilitating the transition to IFRSs because of the importance of extending the uptake of IFRSs. The granting of reasonable practical concessions relating to the transition from national GAAP to IFRSs will assist this process and advance the acceptance of a global set of high quality accounting standards.

***Q1.** Do you agree with the proposed deemed cost option for entities using full cost accounting under previous GAAP? Why or why not? If not, what alternative do you propose and why?*

**Agree. The G100 suggests that the reasons for the exemption should be outlined.**

***Q2.** Do you agree with the proposed disclosure requirements relating to the deemed cost option for oil and gas assets? Why or why not?*

**Agree.**

**However, the disclosure should only need to be made in the year in which IFRSs are adopted and the concession is used.**

***Q3.** Do you agree with the proposed deemed cost option for entities with operations subject to rate regulation? Why or why not? If not, what alternative do you propose and why?*

**Agree.**

**Q4.** *Do you agree with the proposal not to require the reassessment of whether an arrangement contains a lease in the circumstances described in this exposure draft. Why or why not?*

**Agree.**

**Q5.** *Do you agree that the situation referred to in Question 4 is the only one in which additional relief of this type is needed? If not, in what other situations is relief necessary and why?*

**Yes, to our knowledge.**

Yours sincerely

A handwritten signature in black ink, appearing to read 'A Reeves'.

**Tony Reeves**  
National President