

August 24, 2004

Mr. Paul Pacter
Director of Standards for SMEs
International Accounting Standards Board
30 Cannon Street, London EC4M 6XH, United Kingdom

Dear Paul:

The American Institute of Certified Public Accountants (AICPA) appreciates the opportunity to comment on the International Accounting Standards Board (IASB) Discussion Paper, *Preliminary Views on Accounting Standards for Small and Medium-sized Entities*. The AICPA applauds the IASB's efforts to seek views on the topic.

As you are aware, the AICPA has embarked on a major grassroots effort to survey all stakeholders of private company financial reporting prepared in accordance with U.S. generally accepted accounting principles (GAAP). The fundamental focus is to determine if U.S. GAAP financial statements of private companies are meeting the needs of those stakeholders. Part of that focus includes obtaining views on the cost and related benefit of that information. The link to the Web site of our effort is http://www.aicpa.org/members/div/acctstd/pvtco_fincl_reprt/index.htm.

Our survey is still in process. Our best estimate is that we will publicize the results and share them with the IASB by the end of the year. Though the AICPA effort is focused on private companies in the U.S., we expect that the survey results will provide useful insight to the IASB as it considers accounting standards for small and medium-sized entities.

Please contact either of us (Dan 212-596-6168 or Barry 212-596-6001) if you or the Board members have any questions.

Sincerely,

Barry M. Melancon
President and CEO
AICPA

Daniel J. Noll
Director Accounting Standards
AICPA