



Andrea Pryde
International Accounting Standards Board
30 Cannon street
London
EC4M 6XH

25 June 2004

Dear Ms Pryde

Strengthening the IASB's deliberative processes

The Association of Chartered Certified Accountants (ACCA) is pleased to have this opportunity to comment on the above proposals from the IASB. The proposals were considered by ACCA's Financial Reporting Committee and I am writing to give you their views.

We agree with the proposals. We welcome in particular the greater emphasis suggested for both field testing new standards and for the more general use of discussion papers before the Board commits itself in an exposure draft to one particular solution. We recognise that the IASB's due process and the transparency of the development of its standards match, and in most cases exceed, those of any national standard setter. ACCA made some comments on due process in responding to the IASCF Trustees' consultation on changes to the constitution. We have a few additional suggestions and comments to make.

One of the vital objectives for IASB must be to communicate better with its constituents – setting out proposals, why certain decisions were taken and why certain views were not taken up. We think that the proposals do not place enough weight on the role of national standard setters in helping IASB with this task. They would be able to add to IASB's limited resources and may be better placed in terms of language and understanding of national context.

ACCA

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In terms of transparency we consider

- the results of field-testing should be made available as much as possible consistent with the need for confidentiality for the individual companies involved.
- it would be helpful if summaries or analysis of the comments received were made public as well copies of the letters themselves.
- The use of public hearings may not be the most effective form of due process for a global standard setter, in terms of time and costs. There are inevitable questions about what would be the appropriate number and locations of such hearings for example.

If there are any matters arising from the above please be in touch with me.

Yours sincerely

Richard Martin
Head of Financial Reporting