

Peter Walton
Solana del Puente 1
Durcal
18650 Granada
Spain

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Ms Andrea Pryde
IASB
30 Cannon Street
London EC4M 6XH

Dear Ms Pryde

IASB Procedures

As someone who has been an observer at all but two of the Board's public meetings, I thought I should respond to the invitation to comment on that aspect of the Board's procedures. I would stress that this is done in a spirit of feedback, not of complaint, and I do think that the Board and Staff are accommodating to the needs of observers.

1. I imagine it would be worth reviewing the cost/benefit balance when the Board holds its meetings in places such as Oslo or Rome. Presumably the expected benefits are closer liaison with constituents, but in terms of attendance at the standard-setting meetings, there appeared to be very little local participation in either of these locations. Since these meetings are usually held in conjunction with meetings of Standards Advisory Council, it may be that the benefits are more visible in that area. However, it might be better to restrict standard-setting meetings outside London to locations such as Norwalk.

2. It may also be worth questioning whether meetings should continue for as long as eight hours in any one day. Without having done any research, it seems that (a) the debate expands to fill the time available for it; and (b) as people get tired later in the day, they either become entrenched, or they make quick decisions which have to be re-visited subsequently. It might be worth capping meetings at six hours a day, and having four-day rather than three-day meetings.

3. Board members and staff seem to have differing views about communicating with observers during the course of the debate. The Observer Notes are much improved and are mostly very helpful, but they are still variable, and the way in which members refer to their own papers (e.g. in Oslo: "I am willing to go along with the second bullet point but not the first" or "we could include the conditions in paragraph nine") are still opaque at times. It should be said that some people are extremely helpful in this area, and one could not expect the Board to read the Observer Notes to cross

reference, but it may be that the Observer Notes could be cross-referenced to the numbering of the Board papers.

4. Board voting is often not very clear: not all Board members keep their hands up long enough, not all are always immediately aware that a vote is taking place, observers do not have a clear view, etc. My own count of the votes is frequently different from that of the chairman. It might seem a little exaggerated (some might say draconian), but an electric system with a screen displaying the votes would make the position clearer.

5. In terms of the arrangements through which observers register for meetings, difficulties arise because (a) there is no repeating monthly pattern in the timing of publication of the agenda and opening of registration; and (b) sometimes the meeting times are changed at relatively short notice. I do not have any suggestions to make in this area because I am aware of the difficulties that arise in administering the observer registration system, but would just underline that there are real costs involved for regular observers, and, I would imagine, disincentives to attracting new observers, in not finalising arrangements some weeks in advance.

6. An entirely self-interested plea: the FASB and AcSB both provide observers with work surfaces. In some future evolution of the Board's facilities, it would be very helpful if the IASB were to do the same. It is very difficult to write continuously for three days without a table!

Sincerely

Peter Walton