



Association pour la participation des
entreprises françaises à l'harmonisation
comptable internationale



A F E P

Association Française des Entreprises Privées

IASB
30 Cannon Street
London EC4M 6XH
United Kingdom

Paris, March 12, 2009

Re : Exposure Draft of Proposed amendments to IAS 24: "Relationships with the State"

We welcome the opportunity to comment the Exposure Draft of Proposed amendments to IAS 24: "Relationships with the State"

We welcome the proposed exemption for state-controlled entities and commend the Board's effort to consider concerns expressed about the complexity of the proposal in the 2007 ED. Moreover, we agree with the disclosures required.

Although the focus of this new exposure draft is not on the revised definition of a related party, we wish to voice strong concerns about the supplementary changes proposed by the Board. While we support the efforts made in view of eliminating inconsistencies and lack of clarity in the definition, we feel concerned because every new amendment leads each time to a wider scope. We do not find any rationale to support this expansion. Our concerns are one of relevance and one of feasibility. We believe that the relevance of the information obtained with this new definition is even further questionable. We doubt whether any party can valuably influence decisions when holding only significant voting power without control or significant influence in the reporting entity.

Moreover, we note that more and more information needs to be obtained from individuals (key management personnel and their relatives in each and every "related party").

This in our view goes far beyond the information that a group can reasonably be expected to collect (such information cannot be requested and is not obtainable without specific request).

Should you wish any supplementary comment or explanation, please do not hesitate to contact us.

ACTEÓ



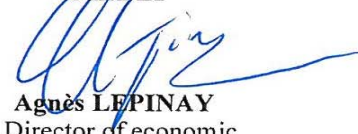
Patrice MARTEAU
Chairman

AFEP



Alexandre TESSIER
Director General

MEDEF



Agnès LEPINAY
Director of economic
and financial affairs