

7 October 2011

Our ref: ICAEW Rep 99/11

Mme Françoise Flores Chair European Financial Reporting Advisory Group 13-14 Avenue des Arts B-1210 Brussels

By email: commentletter@efrag.org

Dear Mme Flores

ICAEW operates under a Royal Charter, working in the public interest. Its regulation of its members, in particular its responsibilities in respect of auditors, is overseen by the Financial Reporting Council. As a world leading professional accountancy body, we provide leadership and practical support to over 136,000 members in more than 160 countries, working with governments, regulators and industry in order to ensure the highest standards are maintained. We are a founding member of the Global Accounting Alliance with over 775,000 members worldwide.

ICAEW welcomes the opportunity to comment on the draft EFRAG comment letter to the IASB on the Exposure Draft *Improvements to IFRSs 2011*. We agree with the comments made in EFRAG's letter. I enclose with this letter a copy of ICAEW's draft response to the IASB which also contains some further observations on the Exposure Draft.

Please do get in touch should you wish to discuss any of the points raised in our draft response.

Yours sincerely

John Boulton ACA Manager, Corporate Reporting, Financial Reporting Faculty

T +44 (0)20 7920 8642

E john.boulton@icaew.com