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December 4, 2003

Office of the Secretary
Public Company Accounting Oversight Board
1666 K Street, N.W.
Washington, D.C. 20006-2803

Re: PCAOB Rulemaking Docket Matter No. 011
Proposed Technical Amendments to Interim Standards Rules

Deloitte & Touche LLP is pleased to respond to the request for comments from the Public Company Accounting Oversight Board (the “PCAOB” or the “Board”) on its *Proposed Technical Amendments to Interim Standards Rules*, PCAOB Rulemaking Docket Matter No. 011 (November 12, 2003).

On April 16, 2003, the PCAOB adopted as interim standards those auditing and attestation standards as promulgated by the AICPA and in existence as of April 16, 2003. Additionally, the PCAOB adopted certain existing quality control, ethics, and independence standards. We understand it is the intention of the PCAOB to modify these interim standards; we have also noted that the proposed auditing standards issued to date by Board have included language that would modify existing interim standards. However, such modifications to interim standards have not been clearly articulated in the auditing standards proposed to date.

Providing clear standards and guidance to auditors is essential in order to ensure audits are performed appropriately. As such, we believe it is extremely important that the changes made to interim standards are clearly articulated in each proposed standard so that auditors and the public understand the potential changes. Accordingly, we suggest that each proposed standard issued by the Board clearly identify how the proposed changes will impact current interim standards, and what conforming changes will need to be made to existing interim standards. This will assist the auditor and the public in understanding the intentions of the Board and help to maintain consistency in the application of standards. An appendix to each proposed standard with such changes might be a way to communicate this information.

We appreciate the opportunity to comment, and would be pleased to discuss these issues with you further. If you have any questions or would like to discuss these issues further, please contact Robert J. Kueppers at (203) 761-3579 or John A. Fogarty at (203) 761-3227.

Very truly yours,

/s/ Deloitte & Touche LLP

cc: William J. McDonough, Chairman of the PCAOB
Kayla J. Gillan, Member
Daniel L. Goelzer, Member
Willis D. Gradison, Jr., Member
Charles D. Niemeier, Member