



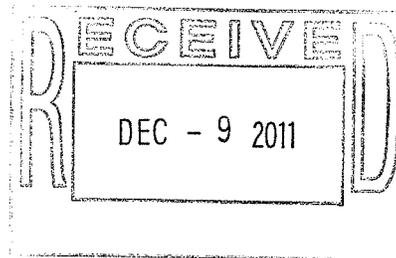
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Public Company Accounting Oversight Board  
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December 1, 2011

**RE: PCAOB Rulemaking Docket Matter No. 37, Concept Release on Auditor Independence and Audit Firm Rotation**

Dear Sir:

The Audit Committee of ACE Limited has reviewed management's letter commenting on the PCAOB's concept release on auditor independence and audit firm rotation and fully supports the views expressed therein. The audit committee would like to emphasize the following points:

- One of the primary responsibilities of the audit committee is to ensure that the audit firm and specifically, the audit team, has the expertise and experience to perform a high quality audit for a complex global insurance company. In our view all the large firms do not meet this qualification and as a result mandatory audit firm rotation may in fact reduce audit quality. Furthermore, some of those firms which are qualified may already be engaged in significant non-audit services for the company and may therefore be precluded from performing an independent audit.
- Cumulative knowledge of a company's operations, processes and financial risk serves to reduce the risk that material misstatements could go undetected -- a clear advantage for audit firm continuity.
- Lastly, we are concerned that mandatory rotation would limit the discretion of the audit committee and impede its ability to carry out its duty to choose the audit firm it believes is the best suited to meet the company's specific audit needs in light of all the factors affecting the company at a given point in time.

We appreciate the opportunity to express our views and would be pleased to discuss any questions or comments that the PCAOB staff or Board may have. Please contact me ([chmnaudit@acebm.com](mailto:chmnaudit@acebm.com)) regarding our submission.

Respectfully submitted,

  
Robert Ripp

Chairman  
ACE Limited Audit Committee