

November 29, 2007

Advisory Committee on the Auditing Profession  
Office of Financial Institutions Policy  
Room 1418  
Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220

Electronically: <http://comments.treas.gov/index.cfm?FuseAction=Home.Reply>

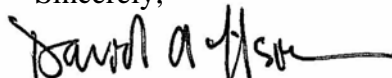
**Re: Discussion Outline for Consideration by the Advisory Committee on the Auditing Profession**

Ladies and Gentlemen:

The New York State Society of Certified Public Accountants, representing 30,000 CPAs in public practice, industry, government and education, submits the following comments to you regarding the above captioned Discussion Outline. NYSSCPA thanks the Advisory Committee for the opportunity to comment on this Outline.

The NYSSCPA's Auditing Standards and Procedures Committee and its Accounting and Auditing Oversight Committee deliberated the Discussion Outline and drafted the attached comments. If you would like additional discussion with us, please contact Robert W. Berliner, the Chair of the Auditing Standards and Procedures Committee, at (212) 503-8853, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,



David A. Lifson  
President

Attachment



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**COMMENTS ON DISCUSSION OUTLINE FOR CONSIDERATION  
BY THE ADVISORY COMMITTEE FOR THE AUDITING PROFESSION**

**November 29, 2007**

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Elliot L. Hendler  
George I. Victor  
Robert N. Waxman**

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### **NYSSCPA Staff**

Ernest J. Markezin

## **New York State Society of Certified Public Accountants**

### **Comments Regarding the Discussion Outline for Consideration by the Advisory Committee on the Auditing Profession**

The New York State Society of Public Accountants commends the Advisory Committee on the Auditing Profession (“Advisory Committee”) for exposing for public comment its Discussion Outline and is pleased to provide the following comments:

We are unable to identify “any other matter relating to the current sustainability of a strong and vibrant auditing profession that the Advisory Committee should consider addressing.” Indeed, we believe that the Discussion Outline identifies too many matters. This could impede the Advisory Committee from effectively addressing the more critical matters within the limited, two-year length of its term.

Our principal recommendation is that the Advisory Committee prioritize those matters as to which it believes emphasis should be directed in developing “recommendations to the Secretary of the Treasury and the Department on the sustainability of a strong and vibrant auditing profession.” Once priorities are established, we recommend that the Advisory Committee re-expose the Discussion Outline for public comment. Without prioritizing the long list of subjects specified in the Discussion Outline and identifying those that are considered most critical, we are concerned that the Advisory Committee will be unable to adequately address the most critical subjects.

Once priorities have been determined and a better “feel” is obtained with respect to the scope of this undertaking, we believe the Advisory Committee will be in a better position to assess the adequacy of its budget and staff resources (which appear to be too limited in relation to its goals).

We have the following additional comments on more specific aspects of the Discussion Outline:

- We do not understand why the Advisory Committee has elected to focus only on the “public company auditing profession.” It would be unfortunate to overlook the nonpublic company auditing profession as to which many of the same issues apply.
- The Advisory Committee should clarify what is meant by the frequent reference to the “audit process and audits.”
- The Advisory Committee should clarify what is meant by the profession operating “in a manner transparent to investors and market participants.”

- The Advisory Committee should clarify what is meant by a competitive and innovative population of auditing firms.
- Considering the large number of subjects affecting the academic community, such as the “accounting curriculum” and the “status of accounting faculty,” we recommend additional representation from the academic community on the Advisory Committee.