

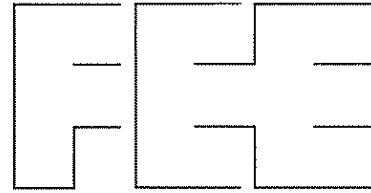
Date
27 September 2007

Secrétariat
Général

Fédération
des Experts
Comptables
Européens

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Ms. Nancy M. Morris
Secretary
Securities and Exchange Commission
100 F Street
NE Washington DC 20549-1090
USA



Dear Ms. Morris,

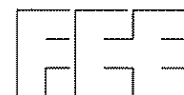
Re: File Number S7-20-07: Concept Release on Allowing US Issuers to Prepare Financial Statements in Accordance with IFRS

1. FEE (Fédération des Experts Comptables Européens – European Federation of Accountants) welcomes the opportunity to respond to the SEC Concept Release on Allowing US Issuers to Prepare Financial Statements in Accordance with IFRS and strongly supports the intention to allow US issuers to prepare financial statements in accordance with IFRS. We provide some general comments but have deemed it more appropriate not to respond to the detailed questions.

General

2. We recall our support for global principles-based standards: FEE is strongly committed to high quality, global, principle-based, neutral financial reporting standards. Global financial markets require financial information prepared in accordance with global standards for reasons of competitiveness and comparability and for capital raising purposes. A principle-based approach to financial reporting means that clear principles designed to serve the public interest underpin a limited number of rules that show how those principles should be applied in common situations. This approach promotes consistency and transparency and helps companies and their advisers to respond appropriately to complex situations and new developments in business practice. It also prevents the risk of regulatory overload from detailed rules that may be developed in an attempt to cope with all the eventualities that may arise in practice.
3. As stated in the 2006 FEE Position Paper on "Financial Reporting: Convergence, Equivalence and Mutual Recognition"¹ FEE considers that mutual recognition of IFRS and US GAAP, provided that they are properly applied, is justifiable since both US GAAP and IFRS can now be considered as two equivalent high quality sets of standards. Sufficient convergence steps have already taken place in terms of standards to provide comparable financial statements and to enable users to take similar economic decisions in similar situations. We consider that this position remains valid in 2007.

¹ http://www.fee.be/publications/default.asp?library_ref=4&content_ref=555



4. We appreciate the SEC's intended recognition of IFRS as a global standard also in light of the Concept Release on Allowing US Issuers to prepare Financial Statements in accordance with IFRS. We also believe that it will become increasingly desirable for the SEC to be able to accept financial statements prepared in accordance with IFRS without reconciliation to US GAAP not only from foreign private issuers but also from US private issuers. We therefore express our support for the introduction of an option for US private issuers to file financial statements prepared in accordance with IFRS.
5. We welcome the increased cooperation between the SEC and CESR as evidenced by the work plan of August 2006. We fully recognise that regulators have an important role to play in the consistent application of IFRS. The governance at preparer level, the work of the auditor and the infrastructure put in place by the regulator will foster the consistent and faithful application of IFRS around the world.
6. We wish to emphasise that global standards should be interpreted at global level, i.e. by IFRIC rather than by national mechanisms. We are therefore of the opinion that, instead of issuing interim measures by the staff, the SEC should refer the accounting issue immediately to IASB or IFRIC unless it consists of a specific national issue. Global standards require global interpretations.

We would be pleased to discuss with you any aspect of this letter you may wish to raise with us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jacques Potdevin'. The signature is written in a cursive style with a long horizontal stroke at the end.

Jacques Potdevin
President