

23 April 2010

The Chairman
Australian Accounting Standards Board
PO Box 204
Collins Street West Victoria 8007
AUSTRALIA

Dear Kevin

Thank you for the opportunity to provide comment on ED 192: Revised Differential Reporting Framework.

The member firms of PKF Australia Limited (the Firms), support the principles of the Revised Differential Reporting Framework.

The Firms support the following:

- Consistent standard of recognition and measurement in the preparation of financial reports;
- The concept that General Purpose Financial Reports should be lodged with the Regulator;
- Reduced disclosures for non – publically accountable entities

The Firms recognise the work undertaken by the Federal Treasury to relieve a large number of small public companies limited by guarantee from the reporting obligations in the Corporations Act 2001.

Concern has been expressed that entities that currently prepare special purpose financial reports could be over- burdened by the cost of increased disclosure under the Reduced Disclosure Regime.

To address these concerns it is recommended that

- The effective date of the RDR regime be deferred by 12 months to allow cost/ benefit impacts to be assessed and disclosure requirements to be refined.
- The AASB considers whether an approach that builds an RDR Disclosure Model may be more appropriate than the current model which deletes disclosures from the full suite of IFRS disclosures.

It has been noted that the AASB has made provision for IFRS for SME's to be introduced at a future point in time should current concerns with that standard be resolved.

Yours Sincerely



Marj Wessels

National Director Professional Standards
PKF Australia Limited.

Subject

Content

Yours sincerely

Name

Title