

**This document contains 36 identical emails. These emails are classified as Comment Letter No. 40.**

**From:** Mike Verner [mailto:mike.verner@bigpond.com]  
**Sent:** Wednesday, 7 April 2010 8:51 AM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

**INSTRUCTIONS:**

Paste the letter from the 2<sup>nd</sup> page of this document into your email body, ensuring to add your name on the bottom and email to:

[standard@asb.gov.au](mailto:standard@asb.gov.au)

With the subject: Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

(b) We object to reclassifying non-reporting Corporations Act entities as entities that will be required to prepare General Purpose Financial Reports and hence be forced to adopt full IFRS recognition and measurement under ED 192. We also object to defining accounting standards as being full IFRS or full IFRS with a reduced disclosure regime. As detailed in over 90% of the submissions made to the AASB in 2007 on ITC 12, we believe that the reporting entity concept should be able to be applied to non-listed corporations and all other entities in determining the application of accounting standards. Requiring full IFRS recognition and measurement makes no sense given that the IASB has effectively limited full IFRS to the listed sector.

**AASB Questions 4-6:**

We believe that the AASB's proposals for differential reporting have regulatory flaws, will not significantly decrease the costs of producing financial statements, and are not in the best interests of the Australian economy. Instead as detailed in our response to Question 2 above, we believe that IFRS for SMEs should be allowed as an option and that there be no mandatory change to the reporting requirements for non-reporting entities.

Yours faithfully M.J.Verner 11 Kodak Close Thornlands Qld 4164

**From:** j wang [mailto:julie-wang@hotmail.com]  
**Sent:** Thursday, 25 March 2010 3:17 PM  
**To:** AASB Mailbox  
**Subject:** ED 192 Revised Differential Reporting Framework  
ED 192 *Revised Differential Reporting Framework*

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2010 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully  
Julie Wang

---

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**From:** Peter Davis Taxation & Accounting Services [mailto:[peter@pdavistaxn.com.au](mailto:peter@pdavistaxn.com.au)]  
**Sent:** Thursday, 25 March 2010 11:53 AM  
**To:** AASB Mailbox  
**Subject:** ED 192  
**Importance:** High

**ED 192 Revised Differential Reporting Framework****AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2010 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully etc

Regards

Peter Davis

B.Bus, Dip FS(FP)  
FPNA, FTIA, SSA, SSAud™, AATF, FChFP, AAIM, JP  
Registered Tax Agent  
SMSF Specialist Advisor™  
SMSF Specialist Auditor™

Peter Davis Taxation & Accounting Services  
ABN 52 003 516 112

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Email; [peter@pdavistaxn.com.au](mailto:peter@pdavistaxn.com.au)

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**From:** Tracey Watts [mailto:tracey@forallaccounts.com.au]  
**Sent:** Thursday, 25 March 2010 3:29 PM  
**To:** AASB Mailbox  
**Subject:** ED 192 Revised Differential Reporting Framework

TO:

[standard@asb.gov.au](mailto:standard@asb.gov.au)

***ED 192 Revised Differential Reporting Framework***

***AASB Question 2:***

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2010 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully

Tracey Watts

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**From:** Vince Zappavigna [mailto:vince@iinet.net.au]  
**Sent:** Thursday, 25 March 2010 10:10 PM  
**To:** AASB Mailbox  
**Subject:** ED192

As a practice dealing mainly with small business entities I am concerned that many of my small clients will be required to incur significant accounting costs to prepare their financial statements.

### Submission on ED 192 Revised Differential Reporting Framework

#### **AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2010 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully etc

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Yours faithfully

Vince Zappavigna FCA

Zappavigna Consulting Pty Ltd

**From:** Shane Hedley [mailto:shane@hedleyaccounting.com.au]  
**Sent:** Friday, 26 March 2010 7:44 AM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

Please find below my submission response to the proposed revised reporting framework.

## **Submission on ED 192 Revised Differential Reporting Framework**

### **AASB Question 2:**



(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2010 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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*Kind regards,  
Shane Hedley*

 (02) 9528 7022 **Fax** (02) 9528 7066  [shane@hedleyaccounting.com.au](mailto:shane@hedleyaccounting.com.au)  
Shop 3, 7-9 White Street (PO Box 25) Jannali NSW 2226

[www.hedleyaccounting.com.au](http://www.hedleyaccounting.com.au)

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**From:** Ilda Wade [mailto:[ildaw@ihug.com.au](mailto:ildaw@ihug.com.au)]  
**Sent:** Friday, 26 March 2010 8:54 AM  
**To:** AASB Mailbox  
**Subject:** Re: Accounting Standards

**TO:**

[standard@asb.gov.au](mailto:standard@asb.gov.au)

### ***ED 192 Revised Differential Reporting Framework***

#### ***AASB Question 2:***

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2010 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully

Best Regards

Ilda A Wade B. Com CPA TA JP  
T: 02 9401 6247, F: 02 9981 3359, M: 0413 944 700  
E: [ildaw@ihug.com.au](mailto:ildaw@ihug.com.au)

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**From:** John Bryan [mailto:john@burgessbryan.com.au]  
**Sent:** Friday, 26 March 2010 12:21 PM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

**AASB Question 2:**

(a) I believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2010 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully

**John Bryan FCA**  
**Chartered Accountant**

**Principal**

<!--[if !vml]--><!--[endif]-->

T (03) 9873 3888

F (03) 9873 2758

E john@burgessbryan.com.au or office@burgessbryan.com.au

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 **Think before you print.**

**From:** Ray Cooling [mailto:ray@raycooling.com.au]  
**Sent:** Friday, 26 March 2010 2:32 PM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (i.e. generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2010 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully

**Ray Cooling**  
**Ray Cooling Chartered Accountant**  
118 Herries Street  
PO Box 804  
Toowoomba 4350  
Ph: 46385712  
F: 46384845

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**From:** Michelle Wilson [mailto:m.wilson@chellecorp.com]  
**Sent:** Saturday, 27 March 2010 10:00 AM  
**To:** AASB Mailbox  
**Subject:** Submission on ED192

Submission on ED 192 Revised Differential Reporting Framework

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Regards

Michelle Wilson

## Chelle Corporation Pty Ltd

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***Please note - we have recently moved -***

***Our new contact details are:***

12 Norman Ave,  
Lutwyche QLD 4030  
Phone: 07 3357 7400

PO Box 446  
Lutwyche QLD 4030  
Fax: 07 3357 3838

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**From:** Uttam Mukherjee [mailto:[uttam.mukherjee@catholicsuper.com.au](mailto:uttam.mukherjee@catholicsuper.com.au)]  
**Sent:** Wednesday, 31 March 2010 3:54 PM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

AASB Question 2:

(a) The IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2010 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully

Regards,

Uttam Mukherjee  
Senior Internal Auditor

---

Australian Catholic Superannuation and Retirement Fund  
PO Box 656, Burwood, NSW, 1805 Ph: 9715 0069 Fax: 9715 0093

Email: [uttam.mukherjee@catholicsuper.com.au](mailto:uttam.mukherjee@catholicsuper.com.au)

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**From:** Steve Shephard [mailto:sshephard@ozemail.com.au]  
**Sent:** Thursday, 1 April 2010 11:23 AM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Submission on ED 192 Revised Differential Reporting Framework

I wish to voice my concerns over the proposed ED 192 Revised Differential Reporting Framework

**AASB Question 2:**

(a) I believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2010 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully

Steven Shephard

Partner

Shephard & McCarthy

Chartered Accountants

Ph 4053 6035

Fax 4053 6481

PO Box 12011D

Cairns DC QLD 4870

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**From:** Doug Fishburn [mailto:famcomm@netspace.net.au]  
**Sent:** Tuesday, 6 April 2010 7:05 PM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

***AASB Question 2:***

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully

Doug Fishburn

**From:** Adam Dierselhuis [mailto:[adam.dierselhuis@oconnellsobm.com.au](mailto:adam.dierselhuis@oconnellsobm.com.au)]  
**Sent:** Wednesday, 7 April 2010 8:38 AM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

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We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

***AASB Question 2:***

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

(b) We object to reclassifying non-reporting Corporations Act entities as entities that will be required to prepare General Purpose Financial Reports and hence be forced to adopt full IFRS recognition and measurement under ED 192. We also object to defining accounting standards as being full IFRS or full IFRS with a reduced disclosure regime. As detailed in over 90% of the submissions made to the AASB in 2007 on ITC 12, we believe that the reporting entity concept should be able to be applied to non-listed corporations and all other entities in determining the application of accounting standards. Requiring full IFRS recognition and measurement makes no sense given that the IASB has effectively limited full IFRS to the listed sector.

***AASB Questions 4-6:***

We believe that the AASB's proposals for differential reporting have regulatory flaws, will not significantly decrease the costs of producing financial statements, and are not in the best interests of the Australian economy. Instead as detailed in our response to Question 2 above, we believe that IFRS for SMEs should be allowed as an option and that there be no mandatory change to the reporting requirements for non-reporting entities.

Yours faithfully

**Adam Dierselhuis** | Director  
D +61 7 3233 6402 | E [adam.dierselhuis@oconnellsobm.com.au](mailto:adam.dierselhuis@oconnellsobm.com.au)

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**From:** Ken Alexander [mailto:kenalexander@pdt.com.au]  
**Sent:** Wednesday, 7 April 2010 8:42 AM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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**AASB Questions 4-6:**

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Regards,

**KEN ALEXANDER | Director | Principal**

**PDT ARCHITECTS**

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**From:** Barbara Christiansen [mailto:barbara@paddininvest.com.au]  
**Sent:** Wednesday, 7 April 2010 12:57 PM  
**To:** AASB Mailbox  
**Subject:**

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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**AASB Questions 4-6:**

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Yours faithfully

**Barbara Christiansen**

[barbara@paddininvest.com.au](mailto:barbara@paddininvest.com.au)

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**From:** Andrew Powell [mailto:AndrewP@plywoodservices.com.au]  
**Sent:** Wednesday, 7 April 2010 1:21 PM  
**To:** AASB Mailbox  
**Subject:** proposed ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully

Andrew Powell

Managing Director

Plywood Services Pty Ltd  
P.O. Box 882  
182 Beatty Road  
ARCHERFIELD QLD 4108  
AUSTRALIA  
Ph: +61 7 3277 2733  
Fax: +61 7 3274 2859  
Email: postmaster@plywoodservices.com.au

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**From:** Michelle Andrlik [mailto:mich\_57@yahoo.com.au]  
**Sent:** Wednesday, 7 April 2010 1:37 PM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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**AASB Questions 4-6:**

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Yours faithfully

Michelle Andrlik

Window Constructions Pty Ltd

**From:** Tony Hackett [mailto:thackett@bgc.cc]  
**Sent:** Wednesday, 7 April 2010 1:39 PM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully

Tony Hackett as ttf The Hackett Super Fund

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**From:** Greg Mahon [mailto:gmahon1961@gmail.com]  
**Sent:** Wednesday, 7 April 2010 2:32 PM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Kind Regards,

Greg Mahon [B.V.Sc.](#), B.Vet.Biol  
Mountain View Veterinary Surgery  
1/86 Burnett St  
BUDERIM Qld 4556  
07 5445 3123 ph  
07 5445 3558 fax

**From:** Michael Stiegler [mailto:michael@hendersonmatusch.com.au]  
**Sent:** Wednesday, 7 April 2010 2:55 PM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully

**Michael Stiegler CA**  
Financial Controller

Henderson Matusch Pty Ltd  
ABN 32 107 343 091 | AFSL No 274484

**Phone:** 07 3229 3688  
**Fax:** 07 3229 3662  
**Email:** michael@hendersonmatusch.com.au

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GPO Box 314, Brisbane QLD 4001

[www.hendersonmatusch.com.au](http://www.hendersonmatusch.com.au)

**From:** Cheryl Williams [mailto:cherylwilliams@orange.jo]  
**Sent:** Wednesday, 7 April 2010 8:44 PM  
**To:** AASB Mailbox  
**Subject:** Proposed ED192 revised differential reporting framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (i.e. generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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**AASB Questions 4-6:**

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Yours faithfully

Cheryl Williams

Please reply to my bluewin address - [cherylwilliams@bluewin.ch](mailto:cherylwilliams@bluewin.ch)

**From:** Mary Purser [mailto:purserem@hotmail.com]  
**Sent:** Wednesday, 7 April 2010 9:01 PM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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Yours faithfully

Brian and Mary Purser

---

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**From:** Jacqueline Parker [mailto:[jparker@hnfp.com.au](mailto:jparker@hnfp.com.au)]  
**Sent:** Thursday, 8 April 2010 8:39 AM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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**AASB Questions 4-6:**

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Kind regards

**Jacqueline Parker CFP B. Comm Dip FP**

Director and Representative  
HN Financial Partners Pty Ltd  
ACN 088 547 077  
AFSL 228969

Principal Member of the Financial Planning Association  
Member of the Boutique Financial Planning Principals Group

Phone (07) 3228 6401  
Fax (07) 3228 6499  
Email [jparker@hnfp.com.au](mailto:jparker@hnfp.com.au)

Postal PO Box 15790 CITY EAST. QLD 4002

Street Level 1, 73 Mary St, BRISBANE, QLD, 4000

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**From:** Robyn Brown [mailto:robynbrown@mymotiv.com.au]  
**Sent:** Thursday, 8 April 2010 9:18 AM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

***AASB Question 2:***

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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***AASB Questions 4-6:***

We believe that the AASB's proposals for differential reporting have regulatory flaws, will not significantly decrease the costs of producing financial statements, and are not in the best interests of the Australian economy. Instead as detailed in our response to Question 2 above, we believe that IFRS for SMEs should be allowed as an option and that there be no mandatory change to the reporting requirements for non-reporting entities.

Yours faithfully

Robyn Brown

**From:** L & K Gibson [mailto:lkgibson@activ8.net.au]  
**Sent:** Thursday, 8 April 2010 10:53 AM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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**AASB Questions 4-6:**

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Yours faithfully,

Luke and Kim Gibson

**From:** Lesley McLennan [mailto:lesleyjmcl@optusnet.com.au]  
**Sent:** Thursday, 8 April 2010 12:17 PM  
**To:** AASB Mailbox  
**Subject:** Proposed ED 192 Revised Differential Reporting Framework

Dear Sirs,

I write to you conveying my concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular I present my concerns in relation to the following:

***AASB Question 2:***

(a) I believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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***AASB Questions 4-6:***

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Yours faithfully

Lesley McLennan

**From:** Peter and Kate Murphy [mailto:pkmurphy@harboursat.com.au]  
**Sent:** Friday, 9 April 2010 2:02 AM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

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**AASB Questions 4-6:**

We believe that the AASB's proposals for differential reporting have regulatory flaws, will not significantly decrease the costs of producing financial statements, and are not in the best interests of the Australian economy. Instead as detailed in our response to Question 2 above, we believe that IFRS for SMEs should be allowed as an option and that there be no mandatory change to the reporting requirements for non-reporting entities.

Yours faithfully

Dr Kate Rebecca Gibson

**From:** Peter and Kate Murphy [mailto:pkmurphy@harboursat.com.au]  
**Sent:** Friday, 9 April 2010 2:03 AM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

(b) We object to reclassifying non-reporting Corporations Act entities as entities that will be required to prepare General Purpose Financial Reports and hence be forced to adopt full IFRS recognition and measurement under ED 192. We also object to defining accounting standards as being full IFRS or full IFRS with a reduced disclosure regime. As detailed in over 90% of the submissions made to the AASB in 2007 on ITC 12, we believe that the reporting entity concept should be able to be applied to non-listed corporations and all other entities in determining the application of accounting standards. Requiring full IFRS recognition and measurement makes no sense given that the IASB has effectively limited full IFRS to the listed sector.

**AASB Questions 4-6:**

We believe that the AASB's proposals for differential reporting have regulatory flaws, will not significantly decrease the costs of producing financial statements, and are not in the best interests of the Australian economy. Instead as detailed in our response to Question 2 above, we believe that IFRS for SMEs should be allowed as an option and that there be no mandatory change to the reporting requirements for non-reporting entities.

Yours faithfully

Peter Lethbridge Murphy

**From:** Rod O'Connell [mailto:rod.oconnell@oconnellsobm.com.au]  
**Sent:** Friday, 9 April 2010 9:43 AM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

(b) We object to reclassifying non-reporting Corporations Act entities as entities that will be required to prepare General Purpose Financial Reports and hence be forced to adopt full IFRS recognition and measurement under ED 192. We also object to defining accounting standards as being full IFRS or full IFRS with a reduced disclosure regime. As detailed in over 90% of the submissions made to the AASB in 2007 on ITC 12, we believe that the reporting entity concept should be able to be applied to non-listed corporations and all other entities in determining the application of accounting standards. Requiring full IFRS recognition and measurement makes no sense given that the IASB has effectively limited full IFRS to the listed sector.

**AASB Questions 4-6:**

We believe that the AASB's proposals for differential reporting have regulatory flaws, will not significantly decrease the costs of producing financial statements, and are not in the best interests of the Australian economy. Instead as detailed in our response to Question 2 above, we believe that IFRS for SMEs should be allowed as an option and that there be no mandatory change to the reporting requirements for non-reporting entities.

Yours faithfully

Rod O'Connell

**Rod O'Connell** | Director

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**From:** Theresa Weber [mailto:theresaweber@iinet.net.au]  
**Sent:** Wednesday, 14 April 2010 9:58 AM  
**To:** AASB Mailbox  
**Subject:** proposed ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

***AASB Question 2:***

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

(b) We object to reclassifying non-reporting Corporations Act entities as entities that will be required to prepare General Purpose Financial Reports and hence be forced to adopt full IFRS recognition and measurement under ED 192. We also object to defining accounting standards as being full IFRS or full IFRS with a reduced disclosure regime. As detailed in over 90% of the submissions made to the AASB in 2007 on ITC 12, we believe that the reporting entity concept should be able to be applied to non-listed corporations and all other entities in determining the application of accounting standards. Requiring full IFRS recognition and measurement makes no sense given that the IASB has effectively limited full IFRS to the listed sector.

***AASB Questions 4-6:***

We believe that the AASB's proposals for differential reporting have regulatory flaws, will not significantly decrease the costs of producing financial statements, and are not in the best interests of the Australian economy. Instead as detailed in our response to Question 2 above, we believe that IFRS for SMEs should be allowed as an option and that there be no mandatory change to the reporting requirements for non-reporting entities.

Yours faithfully

Theresa and Paul Weber



**From:** john burns [mailto:jsburns23@bigpond.com]  
**Sent:** Wednesday, 14 April 2010 11:12 AM  
**To:** AASB Mailbox  
**Subject:** submission on ED192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

(b) We object to reclassifying non-reporting Corporations Act entities as entities that will be required to prepare General Purpose Financial Reports and hence be forced to adopt full IFRS recognition and measurement under ED 192. We also object to defining accounting standards as being full IFRS or full IFRS with a reduced disclosure regime. As detailed in over 90% of the submissions made to the AASB in 2007 on ITC 12, we believe that the reporting entity concept should be able to be applied to non-listed corporations and all other entities in determining the application of accounting standards. Requiring full IFRS recognition and measurement makes no sense given that the IASB has effectively limited full IFRS to the listed sector.

**AASB Questions 4-6:**

We believe that the AASB's proposals for differential reporting have regulatory flaws, will not significantly decrease the costs of producing financial statements, and are not in the best interests of the Australian economy. Instead as detailed in our response to Question 2 above, we believe that IFRS for SMEs should be allowed as an option and that there be no mandatory change to the reporting requirements for non-reporting entities.

Yours faithfully

John & Susan Burns

**From:** Adam Hutchinson [mailto:aj\_hutch@tpg.com.au]  
**Sent:** Thursday, 15 April 2010 6:28 PM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

(b) We object to reclassifying non-reporting Corporations Act entities as entities that will be required to prepare General Purpose Financial Reports and hence be forced to adopt full IFRS recognition and measurement under ED 192. We also object to defining accounting standards as being full IFRS or full IFRS with a reduced disclosure regime. As detailed in over 90% of the submissions made to the AASB in 2007 on ITC 12, we believe that the reporting entity concept should be able to be applied to non-listed corporations and all other entities in determining the application of accounting standards. Requiring full IFRS recognition and measurement makes no sense given that the IASB has effectively limited full IFRS to the listed sector.

**AASB Questions 4-6:**

We believe that the AASB's proposals for differential reporting have regulatory flaws, will not significantly decrease the costs of producing financial statements, and are not in the best interests of the Australian economy. Instead as detailed in our response to Question 2 above, we believe that IFRS for SMEs should be allowed as an option and that there be no mandatory change to the reporting requirements for non-reporting entities.

Yours faithfully

Adam Hutchinson

**From:** Frank Grigg [mailto:fgrigg@bigpond.net.au]  
**Sent:** Sunday, 18 April 2010 12:38 PM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

(b) We object to reclassifying non-reporting Corporations Act entities as entities that will be required to prepare General Purpose Financial Reports and hence be forced to adopt full IFRS recognition and measurement under ED 192. We also object to defining accounting standards as being full IFRS or full IFRS with a reduced disclosure regime. As detailed in over 90% of the submissions made to the AASB in 2007 on ITC 12, we believe that the reporting entity concept should be able to be applied to non-listed corporations and all other entities in determining the application of accounting standards. Requiring full IFRS recognition and measurement makes no sense given that the IASB has effectively limited full IFRS to the listed sector.

**AASB Questions 4-6:**

We believe that the AASB's proposals for differential reporting have regulatory flaws, will not significantly decrease the costs of producing financial statements, and are not in the best interests of the Australian economy. Instead as detailed in our response to Question 2 above, we believe that IFRS for SMEs should be allowed as an option and that there be no mandatory change to the reporting requirements for non-reporting entities.

Yours faithfully

Frank & Elizabeth Grigg

38 Richmond St, CORINDA QLD 4075  
Phone +61 7 3379 1319  
Fax +61 7 3379 1925

**From:** Deborah Christian [mailto:deborah.christian@nbsg.biz]  
**Sent:** Tuesday, 20 April 2010 5:07 PM  
**To:** AASB Mailbox  
**Subject:** Submission on ED 192 Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

(b) We object to reclassifying non-reporting Corporations Act entities as entities that will be required to prepare General Purpose Financial Reports and hence be forced to adopt full IFRS recognition and measurement under ED 192. We also object to defining accounting standards as being full IFRS or full IFRS with a reduced disclosure regime. As detailed in over 90% of the submissions made to the AASB in 2007 on ITC 12, we believe that the reporting entity concept should be able to be applied to non-listed corporations and all other entities in determining the application of accounting standards. Requiring full IFRS recognition and measurement makes no sense given that the IASB has effectively limited full IFRS to the listed sector.

**AASB Questions 4-6:**

We believe that the AASB's proposals for differential reporting have regulatory flaws, will not significantly decrease the costs of producing financial statements, and are not in the best interests of the Australian economy. Instead as detailed in our response to Question 2 above, we believe that IFRS for SMEs should be allowed as an option and that there be no mandatory change to the reporting requirements for non-reporting entities.

Yours faithfully

**Deborah Christian**

GM Finance and Administration

**Gold Coast** 8/83 Lawrence Drive Nerang Queensland 4211  
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**From:** Phillip [mailto:phillipbartlett@responseaust.com.au]  
**Sent:** Thursday, 29 April 2010 11:51 AM  
**To:** AASB Mailbox  
**Subject:** Revised Differential Reporting Framework

Dear Sirs,

We write to you conveying our concerns over the proposed ED 192 Revised Differential Reporting Framework. In particular we present our concerns in relation to the following:

**AASB Question 2:**

(a) We believe that the IFRS for SMEs accounting standard should be an option for non-publicly accountable entities (ie generally other than ASX listed entities) that are required to prepare financial statements and this option should apply to 30 June 2013 or earlier financial statements, so that such entities can enjoy reduced compliance costs of preparing financial statements.

(b) We object to reclassifying non-reporting Corporations Act entities as entities that will be required to prepare General Purpose Financial Reports and hence be forced to adopt full IFRS recognition and measurement under ED 192. We also object to defining accounting standards as being full IFRS or full IFRS with a reduced disclosure regime. As detailed in over 90% of the submissions made to the AASB in 2007 on ITC 12, we believe that the reporting entity concept should be able to be applied to non-listed corporations and all other entities in determining the application of accounting standards. Requiring full IFRS recognition and measurement makes no sense given that the IASB has effectively limited full IFRS to the listed sector.

**AASB Questions 4-6:**

We believe that the AASB's proposals for differential reporting have regulatory flaws, will not significantly decrease the costs of producing financial statements, and are not in the best interests of the Australian economy. Instead as detailed in our response to Question 2 above, we believe that IFRS for SMEs should be allowed as an option and that there be no mandatory change to the reporting requirements for non-reporting entities.

Yours faithfully

Phillip Bartlett

**Phillip Bartlett**

**Principal**  
**Response Consulting Australia**  
w) +61 7 33574400 m) +61 (0) 409046730  
US cell) +1 801 9711770  
[phillipbartlett@responseaust.com.au](mailto:phillipbartlett@responseaust.com.au)  
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