ED203 sub 2



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Sir David Tweedie Chairman

International Accounting Standards Board 30 Cannon Street London EC4M 6XH

13 October 2010

Dear Sir

Removal of fixed dates for first-time adopters (proposed amendments to IFRS 1)

We are pleased to respond to your invitation to comment on the Exposure Draft – Removal of fixed dates for first-time adopters (proposed amendments to IFRS 1) ('exposure draft').

Following consultation with members of the PricewaterhouseCoopers network of firms, this response summarises the views of the member firms that commented on the exposure draft. 'PricewaterhouseCoopers' refers to a network of member firms of PricewaterhouseCoopers International Limited, each of which is a separate and independent legal entity.

We agree with the proposed amendments in the exposure draft. We believe that the removal of the references to fixed dates in the standard is consistent with the principles of IFRS 1.

If you have any questions on the content of this letter, please do not hesitate to contact John Hitchins, PwC Global Chief Accountant (+44 20 7804 2497), or James Saloman (+1 416 941 8249).

Yours faithfully

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PricewaterhouseCoopers LLP