

18 September 2006

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

Dear David,

IFRIC Draft Interpretation D19: IAS 19 (AASB 119) – The Asset Ceiling: Availability of Economic Benefits & Minimum Funding Requirements

The Institute of Chartered Accountants in Australia (ICAA) supports the proposals to clarify the requirements in IAS 19 by the Issue of an IFRIC Interpretation that requires any minimum funding requirements to be taken into account when recognizing an Asset or adjusting a Liability, and that be accounted for in a like manner to other IAS 19 amounts.

The Institute believes that the proposals in D 19 do not have any Regulatory Issues or Impact on the best interests of the Australian economy, as minimum funding requirements do not apply to Australian Superannuation Funds.

If you require any further information on any of our views please contact me.

Yours sincerely

Keith Reilly FCA Technical Standards Adviser