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Mr David Boymal
Chairman
Australian Accounting Standards Board
PO Box 204
COLLINS STREET WEST VIC 8007

20 December 2005
Our ref: DR:SC

Dear David

Re: Invitation to Comment *Proposed Interpretations Model for Australian Accounting Standards*

Deloitte Australia welcomes the opportunity to comment on the proposals contained in Invitation to Comment *Proposed Interpretations Model for Australian Accounting Standards*.

We support the Proposed Interpretations Model outlined in the Invitation to Comment. We consider that the proposals will provide more timely guidance to constituents than a formally established body such as the current Urgent Issues Group and will provide a flexible structure which is adaptable to changing circumstances and issues.

In addition to the above comments, we attach to this letter our responses to the specific questions raised in the Invitation to Comment.

If you have any questions concerning our comments, please contact Darryn Rundell on (03) 9208 7916.

Yours sincerely



Darryn Rundell
Partner

MATTERS FOR SPECIFIC COMMENT

(a) whether the proposal to establish advisory panels on issues is a more flexible and adaptive approach than having a formally established body.

We support the use of advisory panels over a formally established body. We consider that this will result in a more flexible and adaptive approach to providing guidance and is likely to result in the issue of more timely guidance.

(b) whether the proposed size and composition of advisory panels and appointment on the basis of professional competence and relevant experience is preferable to appointment on the basis of representation.

We support the proposed size and composition of advisory panels. In particular, we agree that is preferable for appointment to be based on professional competence and relevant experience rather than on the basis of representation. We consider that this proposal will result in the issue of higher quality guidance to constituents.

(c) whether the formation of an Interpretations Agenda Committee, its role and the manner in which requests for guidance are dealt with will facilitate more timely responses on issues.

We support the formation of an Interpretations Agenda Committee and consider that its proposed operations will facilitate more timely responses on issues.

(d) whether the manner of the interaction with the IFRIC and its processes is appropriate.

We consider that the proposed relationship with the IFRIC is appropriate.