

DAIMLERCHRYSLER

Ms. Nancy M. Morris
Secretary
U.S. Securities and Exchange Commission
100 F. Street, NE
Washington, DC 20549-1090
USA

September 15th, 2007

RE:

**RELEASE NOS. 33-8831; 34-56217; IC-27924
FILE NO. S7-20-07**

**CONCEPT RELEASE ON ALLOWING U.S. ISSUERS
TO PREPARE FINANCIAL STATEMENTS IN ACCORDANCE WITH
INTERNATIONAL FINANCIAL REPORTING STANDARDS**

Dear Ms. Morris

thank you for providing the opportunity to comment on this U.S. Securities and Exchange Commission ("SEC") concept release. DaimlerChrysler AG ("DCAG") highly appreciates the SEC to issue this concept release on allowing U.S. issuers to prepare their financial statements in accordance with International Financial Reporting Standards ("IFRS") for SEC filings. We are pleased to respond to the considerations made.

DCAG believes that in addition to the proposed amendments by the SEC to accept financial statements in accordance with IFRS from foreign private issuers ("FPIs") without a reconciliation to United States generally accepted accounting principles ("U.S. GAAP"), allowing U.S. issuers to prepare their financial statements in accordance with IFRS would level the playing field for domestic and foreign issuers when filing with the SEC. Moreover, this would represent a consequent step towards accepting the IFRS and U.S. GAAP as high-quality, comparable sets of accounting standards.

Enclosed you will find DCAG's perspective concerning certain concept release issues.

Yours sincerely,



Robert Köthner
Vice President
Chief Accounting Officer



Dr. Friedrich Siener
Director
Methods Group

COMMENTS ON CERTAIN CONCEPT RELEASE ISSUES

Level playing field for U.S. issuers and foreign private issuers filing with the SEC

The recently published proposed rule by the SEC, which is strongly supported by DCAG and was commented accordingly, would allow FPIs to file financial statements with the SEC that are in accordance with IFRS without a reconciliation to U.S. GAAP. DCAG believes that the SEC's step to publish this concept release on allowing U.S. issuers as well to use IFRS when preparing financial statements for SEC filings represents the only reasonable implication to the previously proposed rule. Giving both domestic and foreign issuers the option to file their financial statements in accordance with IFRS would indispensably level the playing field when filing with the SEC.

Under certain conditions, U.S. issuers would be enabled to accelerate satisfying the requirements with regard to the preparation of financial statements as well as reducing costs in doing so. Especially in situations when they are literally urged to report under IFRS because of a critical mass of companies in a certain industry sector or market that is already reporting under IFRS or when the U.S. issuer itself has a large number of foreign subsidiaries that are required to report under IFRS or when the U.S. issuer is a subsidiary of an international company, which prepares its group financial statements according to IFRS.

Particularly, internationally operating companies would avail themselves of the allowance to use IFRS, preparing financial statements for SEC filings with less complexity and costs when using only one set of high-quality globally accepted accounting principles.

Investors and market participants are able to understand and work with IFRS. Additionally, investors will benefit in terms of better rates of return in course of cost savings.

Allowing domestic and foreign issuers to use IFRS for SEC filings would also enable U.S. capital markets to benefit from the development of foreign capital markets with regard to the increasing worldwide implementation of IFRS. To be accompanied with the attraction of foreign issuers and investors, this step would facilitate capital formation in the U.S. public capital market.

Therefore, DCAG requests the SEC to allow U.S. issuers to prepare their financial statements in accordance with IFRS for SEC filings.

Process for convergence of the IASB and the FASB

When asking about the prospective development of convergence between U.S. GAAP and IFRS, one has to ask first about the original ambition to initiate the convergence process. So, the long-term goal declared in the Memorandum of Understanding between the FASB and the IASB ("MoU") has been to develop a single set of high-quality globally accepted accounting standards. The acceptance of IFRS for SEC filings is a significant milestone to achieve this goal,

acknowledging the progress of convergence made so far. Furthermore, it would indicate the development of comparable sets of accounting standards that could be used for both domestic and cross-border financial reporting, what has been the FASB's and the IASB's commitment in the MoU.

Therefore, DCAG requests the SEC to accept IFRS financial statements from both domestic and foreign issuers to give consideration to the FASB's and IASB's convergence efforts made so far in fulfilling their commitment in the MoU.

Generally, DCAG strongly believes that in consideration of the past developments, the movement towards the implementation of one single set of high-quality globally accepted accounting standards should continue under any circumstances. The elimination of the reconciliation requirement to U.S. GAAP for FPIs when preparing IFRS financial statements and the allowance for U.S. issuers to prepare financial statements in accordance with IFRS for SEC filings can be considered major steps towards that goal.