

Nancy M. Morris
Secretary, SEC
100 F Street, NE
Washington, DC 20549-1090
March 2, 2008

RE: File Number S7-06-03

After reviewing Release 33-8889 regarding a proposed amendment to grant an extension for non-accelerated filers to begin to comply with the auditor attestation report requirements as stated in Item 308T of Regulation S-K, I do not believe it would be in the best interest of the SEC to grant the proposed extension. While I can understand and acknowledge the reasoning behind the proposal, I do not feel that is a necessity.

I do not feel the proposed extension is necessary because I believe that all publicly held firms should be held to the same level of accountability required in financial reporting, regardless of the relative size of a firm. Although I acknowledge that granting the extension would potentially aid smaller companies by reducing any unnecessary compliance costs, I feel that it would not be beneficial in the long term. These firms have been aware of the changes that were in store for a fair amount of time and were already previously granted a similar extension. It is responsibility of the firm to take the initiative with regards to being compliant with regulations and I feel that they have had sufficient time to do so.

I feel that the proposed extension would negatively affect any current or potential investors in non-accelerated filers, especially when the present state of the national economy is taken into consideration. One would believe that an investor would want to be certain that a firm is compliant with regards to current regulations and legislation. If a firm does not meet the auditor attestation requirement, investors might view the firm in a negative light and shy away from potentially investing in that firm. Any potential benefit the firm may receive from reducing compliance costs would be small in magnitude compared to the potential loss they would incur with regards to a loss of investor-supplied capital that results from a negative opinion held by investors stemming from not being assured of a firm's compliance.

In summation, I feel that it would not be in the best interest of the SEC to adopt the proposed amendment which would grant another extension to non-accelerated filers. While I do acknowledge some of the potential benefits and reasoning for granting an extension, I do not believe it to be necessary nor effective.

Sincerely,

Brian Mulrooney
Accounting Student
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