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Regarding: File Number 4-539

I would like to express my appreciation for the work of the SEC staff in planning and holding the roundtable to discuss mutual recognition on June 12, 2007. As we are clearly in a global economy, it is important that the SEC stay in the forefront of these changes as the leading regulator. The SEC should be commended for addressing this important issue in a very thoughtful and cautious view.

Global Policy Development

It is important that certain global standards be established that are acceptable which govern on a fair and level playing field which does not disadvantage one jurisdiction over another due to culture or legal or regulatory structural differences as long as the concepts are complied with on a holistic basis with the proper amount of investor protection and accountability.

Utilization of International Forums

International organizations are already in place which could act as a catalyst in establishing a common global policy with accountability. IOSCO already has a significant securities membership and has developed a lot of best practices in relation to securities regulation and shareholder protection. Another organization that could act as a catalyst is the OECD which already represents the governments of the most developed countries which would be the initial candidates for a mutual recognition project. The OECD has experience in developing conventions in which a monitoring process was established to evaluate a country's compliance to the convention (the OECD Anti-Corruption Convention).

The monitoring of the countries to the OECD Anti-Corruption Convention posed the same difficulties discussed at the SEC Roundtable, how to establish and monitor other jurisdictions to make sure that the capital markets are protected. As a result, the monitoring group had to choose a process that evaluates each country's compliance using a holistic approach. Certain strengths in one area of regulation might compensate for weaknesses in another as long as policy compliance left no major gaps.

Mutual Recognition

Mutual recognition and the evaluation process could be set up similar to what the PCAOB has done to establish assurance that the audit profession in foreign jurisdictions has a comparable system set up within their jurisdiction. The European Union and most developed countries are at some level of establishing their own auditor oversight authority.

The SEC may wish to also seek the guidance of the CPA community. Accounting services were the first professional service to be mandated for reciprocity through a mutual evaluation process. This was no easy task for the CPA community since the licensing of CPAs is controlled by state jurisdictions. The National Association of State Accounting Boards and the American Institute of CPAs formed a joint committee to evaluate and work out a process of mutual reciprocity of the right to practice as a CPA.

If you would like to discuss these ideas in further detail on how this process can be managed and accomplished, please do not hesitate to contact me.

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