

February 13, 2007

Securities and Exchange Commission
450 Fifth Street, NW
Washington, DC 20549

Dear Madam or Sir,

First of all, I would like to thank the Securities and Exchange Commission for providing the opportunity to comment on the Sarbanes-Oxley Act. After reviewing the proposed Section 404, I have summarized my thoughts and opinions.

Auditing standards should be set by the law and not be open to interpretation by the large audit firms, which leaves room for interpretative error and increases SOX compliance costs.

I believe that the standards should also focus on fraud, and auditors should be trained more effectively on how to identify and prevent fraud. Remember, the reason for the creation of the Sarbanes-Oxley Act, is because of the fraudulent scandals that occurred in the late 1990's; not because of innocent misrepresentations made by internal staff.

The external auditors need to rely more on the work of the internal auditors, and perhaps eliminate some of the duplicate testing and retesting. The costs related to external auditors checking and rechecking internal audit staffs work, has allegedly become detrimental to job creation, and the growth of small companies.

In my opinion, external auditors should minimize auditing low risk areas of the business, such as hiring practices, job descriptions, and training.

Lastly, the Sarbanes-Oxley Act requires that the CEO and CFO certify, by signing off, that the company followed the regulations and responsibilities under the Sarbanes-Oxley Act. The signatures are to boost investor confidence, and public interest. However, these signed certifications are difficult to retrieve, and often signed with electronic signatures. The lack of public display and the importance of the signing event seem to be negated by allowing these certifications to be buried in the 10K.

I appreciate this opportunity to share my opinions, views, and concerns with you.

Sincerely,

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