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

12 May 2008

Dear Ms Morris

Foreign Issuer Reporting Enhancements; Proposed Rule (File No. S7-05-08)

The Royal Bank of Scotland Group plc ("RBS" or the "Group") is one of the world's largest banking and financial services groups.

Whilst we support many of the proposed changes, we strongly urge the Commission not to adopt the proposal to accelerate the Form 20-F filing deadline. RBS accepts that it is appropriate to review reporting deadlines of foreign private issuers now that the Commission has removed the requirement to reconcile financial statements prepared in accordance with IFRS to US GAAP. The proposal itself refers to the European Union's Transparency Directive which requires companies listed on an EU regulated market to file their annual financial reports four months after the end of each financial year. Bringing forward the Form 20-F deadline will force EU issuers to file accounts in their home jurisdiction a month earlier than required, effectively overriding domestic filing requirements.

We believe the Commission should reject the proposal to accelerate the Form 20-F filing deadline and instead consider aligning the Form 20-F filing date with domestic regulator requirements, whilst allowing a short period of time thereafter, say 2 – 3 weeks, for example 15 May for calendar year-end companies, for conversion of documents into SEC filing formats and related review procedures.

If the Commission accepts our recommendation, the filing deadline for foreign private issuers will be shortened by some six weeks. We consider that a two year transition period would be adequate for such issuers to prepare for the new deadlines.

Thank you for the opportunity to comment on the proposals.

Yours sincerely

A handwritten signature in black ink, appearing to read "Rajan Kapoor", written in a cursive style.

Rajan Kapoor
Group Chief Accountant