CENTER FOR CAPITAL MARKETS
COMPETITIVENESS

MICHAEL J. RYAN, JR.
EXECUTIVE DIRECTOR AND SENIOR VICE PRESIDENT

September 26, 2007

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

RE: Release Nos. 33-8836; 34-56293; File No. 265-24

Dear Ms. Morris:

The U.S. Chamber of Commerce is the world's largest business federation, representing more than 3 million businesses and organizations of every size, sector, and region. We commend the U.S. Securities and Exchange Commission (SEC) on creating the Advisory Committee on Improvements to Financial Reporting (CIFiR), chaired by Robert Pozen, and are pleased to support using the Discussion Paper prepared by Mr. Pozen as an outline for consideration and discussion by CIFiR. The Discussion Paper is comprehensive, thoughtful and should prove to be a sound platform for the Advisory Committee's work.

Accounting and financial statement complexity undermines the efficiency of our capital markets by creating unnecessary costs or other obstacles for issuers, investors, analysts and regulators. We believe that the dramatic increase in accounting restatements in recent years is more attributable to the complexity of our accounting rules rather than misapplication of clear rules or intentional wrong-doing on the part of public companies. This belief is supported by the observation that many of the recent restatements have created minimal responses in the marketplace. These restatements are accompanied with explanations which the market views as representing an issue of accounting interpretation rather than an actual deficiency that truly impacts the business. We look forward to the Committee's studies related to the causes and impacts of accounting complexity as well as the consideration of transitioning toward principles-based standards as a viable reform mechanism.

In addition to supporting the efforts of the Advisory Committee, the Chamber strongly advocates the movement toward global accounting standards and encourages the CIFiR to focus on this very important issue. In this regard, the Chamber recently provided comments on the SEC's July 2 proposal to accept financial statements from foreign private issuers under International Financial Reporting Standards (IFRS) without reconciling with U.S. Generally Accepted Accounting Principles (GAAP). The Chamber strongly supports this rule-making effort to reduce unnecessary regulatory costs for foreign companies raising capital in the U.S. However, we would note for the benefit of CIFiR that we called upon the SEC to modify its proposal to accept reasonable variations of IFRS. Requiring rigid adherence to the International Accounting Standards Board (IASB) version of IFRS would in effect be forcing foreign private issuers to transition from one reconciliation process to another. We urge the Advisory Committee to consider this and other areas where the SEC can work to make the transition to IFRS as timely and efficient as possible.

Finally, we would also note that the Chamber also supports the SEC's August 14 concept release on allowing U.S. issuers to prepare financial statements in accordance with IFRS. This is another important step to achieving consistent global accounting standards and better aligning the U.S. with the increasing globalization of financial markets.

We look forward to participating in the Committee's development and progress, particularly in the areas addressing the substantive complexity of accounting rules and international accounting convergence.

Thank you for your consideration.

Sincerely,
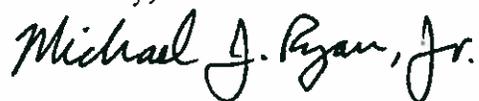
Michael J. Ryan, Jr.

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cc: Christopher Cox, Chairman, U.S. Securities and Exchange Commission
Paul S. Atkins, Commissioner, U.S. Securities and Exchange Commission
Kathleen L. Casey, Commissioner, U.S. Securities and Exchange Commission
Annette L. Nazareth, Commissioner, U.S. Securities and Exchange Commission