

March 31, 2009

Florence E. Harmon, Acting Secretary  
Securities and Exchange Commission  
100 F Street, NE, Washington, DC 20549-1090

Re: File No. S7-27-08: "Roadmap for the Potential Use of Financial Statements Prepared in Accordance with International Financial Reporting Standards by U.S. Issuers"

Dear Ms. Harmon:

As a student in the Master of Accountancy program at Western Illinois University in Macomb, Illinois, my international accounting class has recently discussed the potential convergence to IFRS. In our discussions, we reviewed the SEC's Concept Release and Roadmap. Because I am in favor of the transition, I have responded to the first and third questions of the Roadmap.

**Question One: "Do commenters agree that U.S. investors, U.S. issuers and U.S. markets would benefit from the development and use of a single set of globally accepted accounting standards? Why or why not? What are commenters' views on the potential for IFRS as issued by the IASB as the single set of globally accepted accounting standards?"**

**Answer:** Yes, U.S. investors, issuers, and markets would benefit from an internationally accepted standard. Investors would benefit from the acceptance of IFRS. Because the world is a global market, investment managers advise clients to diversify their portfolios and purchase international securities. Currently, however, U.S. investors can only compare U.S. companies to comparable international companies who reconcile their information to U.S. GAAP. If IFRS were allowed for US issuers, US investors would more easily be able to compare financial statements of US companies with those of foreign companies already using IFRS.

The acceptance of IFRS could also improve the confidence of international stock markets and U.S. markets. Many large U.S. companies may not be listing their securities on foreign exchanges because they would have to prepare their financial statements in IFRS or local GAAP. If the SEC allowed IFRS, more U.S. companies may be willing to list their securities on foreign exchanges. Similarly, large international companies would have more incentive to list on U.S. markets. Accordingly, investors would have more choices for diversifying their portfolios, and companies would have more access for capital. With more choices on the U.S. exchanges and more comparative information, IFRS should improve investors' confidence in the U.S. stock market.

Issuers would benefit in more ways than one. If the U.S. adopts IFRS as GAAP, U.S. issuers would experience cost and time savings. It would relieve them from having to prepare two sets of financial reports. The use of IFRS by US issuers would also standardize the education and certification qualifications of U.S. accountants with those of other accountants also knowledgeable of international standards. If other countries requiring IFRS have a shortage of accountants, U.S. accountants could reduce the shortage; they would have equivalent education and certification qualifications as other accountants in countries already following IFRS.

United States investors, issuers, and markets would benefit greatly from the implementation of IFRS. Investors would have more investment options, markets would improve because of enhanced investor confidence, and issuers would save time and money by not having to follow multiple sets of standards.

**Question Three: “Do commenters agree with the timing presented by the milestones? Why or why not? In particular, do commenters agree that the Commission should make a determination in 2011 whether to require use of IFRS by U.S. issuers? Should the Commission make a determination earlier or later than 2011? Are there any other timing considerations that the Commission should take into account?”**

**Answer:** Yes, the current timing of IFRS adoption seems reasonable and achievable. It has recently been mentioned that Mary Shapiro may delay the transition to IFRS. Unfortunately, this seems inappropriate. This would be a set-back to the improvements made in favor of the transition since 2002. As a result of the Norwalk Agreement, the FASB and IASB have been working closely since 2002 to resolve differences in their respective standards. Although differences do still exist, the two have made significant progress towards convergence, and it would be unfortunate to delay the transition. If Shapiro delays the transition, her action may signal a lack of confidence in the relationship between FASB and IASB.

The original timeframe gives the SEC sufficient time to review IFRS. More importantly, FASB and IASB will have enough time to resolve remaining differences. Allowing certain accelerated filers to prepare reports according to IFRS in 2010 will allow the SEC the opportunity to review the impact for slightly less than a year before the suggested deadline. Although this may not be a long time, it does give them time to investigate any obvious problems. Moreover, the SEC, FASB, and IASB will still have about four years to resolve final differences before the transition is completed in 2014.

Making a final determination in 2011 seems highly possible. Given that the European Union accepted IFRS in 2002 and required their use as of 2005, the SEC’s timeline parallels that of the EU’s. Between the date of approval and the date of required use, the SEC would be giving companies three years to educate their accountants and to also adjust their information operating systems.

Extending the timeline seems disadvantageous to U.S. companies and investors. The SEC, FASB, and IASB have worked extensively to minimize differences and ease the transition. Given that the SEC should be able to identify problems before the deadline and to learn from the experiences of others who have already adopted IFRS, the SEC should be able to make its decision by 2011.

The SEC should accept IFRS as the single set of globally accepted accounting standards. Investors, issuers, and markets in the United States will benefit greatly from IFRS. Additionally, because the FASB and IASB have reduced areas of differences between IFRS and U.S. GAAP, the current timeframe seems highly attainable. U.S. issuers are prepared to accept IFRS. All they are waiting for is the SEC's approval and a deadline. If the SEC approves the IFRS standards and sets a deadline for their implementation, the U.S. will accept the decision and meet the challenge of implementing these global standards.

Sincerely,

Jonathan Myers