

**File Memorandum**

To : Commission File Nos. S7-13-07 and S7-20-07

From : Julie A. Erhardt  
Deputy Chief Accountant  
Office of the Chief Accountant  
U.S. Securities and Exchange Commission

Re : Acceptance From Foreign Private Issuers of Financial Statements Prepared in  
Accordance With International Financial Reporting Standards Without  
Reconciliation to U.S. GAAP (Release No. 33-8818)

and

Concept Release On Allowing U.S. Issuers To Prepare Financial Statements In  
Accordance With International Financial Reporting Standards (Release No. 33-  
8831)

Date : September 18, 2007

---

On August 15, 2007 Conrad Hewitt, Chief Accountant, and Julie Erhardt, Deputy Chief Accountant, and various other SEC staff members participated in a meeting with representatives of the Professional Practice Executive Committee of the Center for Audit Quality (Center). The meeting was held at the SEC's offices in Washington, D.C.

The purpose of the meeting was to provide updates regarding ongoing Commission and Center initiatives of interest. One subject discussed during the meeting was international financial reporting standards. Specific matters discussed were the status of the Commission's Concept Release on IFRS; its proposal for the elimination of the US GAAP reconciliation to IFRS; and, with respect to the use of IFRS, the requirement contained in the PCAOB Audit Standards related to the involvement of individuals in the review of the use of US accounting and audit standards by non-US issuers and auditors, respectively. This requirement is sometimes referred to as the "Appendix K" requirement.

Mr. Hewitt and Ms. Erhardt responded to questions from participants about the status of the SEC's considerations of financial reporting pursuant to IFRS (comment letters received to-date,

incentives and barriers for US companies relative to use of IFRS, the situation of US audit firms relative to auditing IFRS financial statements, and so forth).