

May 12, 2009

Mr. Mike Glynn
AICPA
1211 Avenue of the Americas
New York, N.Y. 10036-8775

By e-mail: mglynn@aicpa.org

**Re: Proposed Statements on Auditing Standards
Required Supplementary Information
Other Information in Documents Containing Audited Financial Statements
Other Information in Relation to the Financial Statements as a Whole**

Dear Mr. Glynn:

The New York State Society of Certified Public Accountants, representing 30,000 CPAs in public practice, industry, government and education, welcomes the opportunity to comment on the above captioned exposure draft.

The NYSSCPA's Auditing Standards Committee deliberated the exposure draft and prepared the attached comments. If you would like additional discussion with us, please contact Robert N. Waxman, Chair of the Auditing Standards Committee at (212) 755-3400, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,



Sharon Sabba Fierstein
President

Attachment

**NEW YORK STATE SOCIETY OF
CERTIFIED PUBLIC ACCOUNTANTS**

**COMMENTS ON
PROPOSED STATEMENTS ON AUDITING STANDARDS
REQUIRED SUPPLEMENTARY INFORMATION
OTHER INFORMATION IN DOCUMENTS CONTAINING AUDITED
FINANCIAL STATEMENTS
OTHER INFORMATION IN RELATION TO THE FINANCIAL STATEMENTS
AS A WHOLE**

May 12, 2009

Principal Drafters

**Robert W. Berliner
Fred R. Goldstein**

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New York State Society of Certified Public Accountants
Auditing Standards Committee

Comments on
Proposed Statements on Auditing Standards
Required Supplementary Information
Other Information in Documents Containing Audited Financial Statements
Other Information in Relation to the Financial Statements as a Whole

The New York State Society of Certified Public Accountants welcomes the opportunity to comment on the above captioned AICPA Auditing Standards Board's (ASB) Proposed Statements on Auditing Standards. We support the ASB's efforts to improve the clarity and reduce the complexity of auditing standards, as well as its ongoing goal to converge its standards with International Standards on Auditing (ISAs).

Overall Comments

We generally agree with the provisions of each of the three proposed standards concerning Supplementary Information. Below are our responses to the four questions posed to respondents by the ASB in the exposure draft.

Question 1. Are the auditor's objectives appropriate?

Yes, the auditor's objectives are appropriate.

Question 2. Are the revisions from the existing standards to converge with ISA 720 (Redrafted) appropriate?

Yes, the revisions from the existing standards to converge with ISA 720 (Redrafted) are appropriate.

Question 3. Are the differences between the proposed SAS, *Other Information in Documents Containing Audited Financial Statements*, and ISA 720 (Redrafted) identified in Exhibit B, and other language changes, appropriate?

Yes, the differences between the proposed SAS, *Other Information in Documents Containing Audited Financial Statements*, and ISA 720 (Redrafted) identified in Exhibit B, and other language changes, are appropriate.

Question 4. Have considerations for audits of smaller, less complex entities and governmental entities been dealt with appropriately?

We agree that considerations for audits of smaller, less complex entities and governmental entities have been dealt with appropriately.

Additional Comments

We suggest that the wording in Paragraph 13 in the proposed revision to the SAS for *Other Information in Documents Containing Audited Financial Statements* should be changed by inserting the word “appropriate” for the word “necessary,” as follows:

13. When revision of the other information is necessary and management agrees to make the revision, the auditor should carry out procedures appropriate under the circumstances. (Ref: par. A10)