



Home of the Trusted Professional

3 park avenue, at 34th street, new york, ny 10016-5991
212.719.8300 • fax 212.719.3364
www.nysscpa.org

June 20, 2005

Mr. Michael Glynn
Technical Manager
Audit and Attest Standards
AICPA
1211 Avenue of the Americas
New York, NY 10036

By email: mglynn@aicpa.org

Re: Exposure Draft of Proposed Statement on Standards for Accounting and Review
Services – *Restricting the Use of an Accountant's Compilation or Review Report*

Dear Mr. Glynn:

The New York State Society of Certified Public Accountants, the oldest state accounting association, represents approximately 30,000 CPAs that will implement the provisions proposed in the captioned exposure draft. NYSSCPA thanks AICPA for the opportunity to comment on its exposure draft.

The NYSSCPA Accounting and Review Services Committee deliberated the exposure draft and prepared the attached comments. If you would like additional discussion with the committee, please contact Joseph A. Maffia, chair of the committee, at (212) 980-2470, or Robert Colson, NYSSCPA staff, at (212) 719-8350.

Sincerely,

Stephen F. Langowski
President

Attachment

NYSSCPA 2005- 2006 Board of Directors

Stephen F. Langowski, <i>President</i>	William Aiken	Raymond P. Jones
Thomas E. Riley, <i>President-elect</i>	Deborah L. Bailey-Browne	Don A. Kiamie
Raymond M. Nowicki, <i>Secretary</i>	Thomas P. Casey	Nancy A. Kirby
Neville Grusd, <i>Treasurer</i>	Ann B. Cohen	John J. Lauchert
Victor S. Rich, <i>Vice President</i>	Michelle A. Cohen	Howard B. Lorch
Susan R. Schoenfeld, <i>Vice President</i>	Debbie A. Cutler	Beatrix G. McKane
Stephen P. Valenti, <i>Vice President</i>	Anthony G. Duffy	David J. Moynihan
Louis Grumet, <i>ex officio</i>	Robert L. Ecker	Ian M. Nelson
	Mark Ellis	Richard E. Piluso
	David Evangelista	Robert T. Quarte
	Joseph M. Falbo, Jr.	C. Daniel Stubbs, Jr.
	Dr. Myrna L. Fischman	Anthony J. Tanzi
	Daniel M. Fordham	Edward J. Torres
	Phillip E. Goldstein	Robert N. Waxman
	Raymond P. Jones	Philip G. Westcott
	John J. Kearney	Ellen L. Williams
		Richard Zerah

NYSSCPA 2005 - 2006 Accounting and Review Services Committee

Joseph A. Maffia, Chair	Alan Director	Walter Orenstein
Michael J. Aroyo	Audrey J. Dussard	John Sacco
Harvey G. Beringer	Julie Galaska	Kenneth Smith
Roseanne G. Bowen	Stacy M. Glasser	Ira M. Talbi
Joseph G. Boyce	Jay Goldberg	George Weiss
John J. Buchheit	Khalil Issa	Lawrence A. Wolff
Bridget Burnell	Zev Landau	
Daniel J. Cannon	Melvyn M. Ockner	

NYSSCPA 2005 - 2006 Accounting & Auditing Oversight Committee

Paul D. Warner, Chair	Joseph A. Maffia	Warren Ruppel
George I. Victor, Vice Chair	Robert S. Manzella	Ira M. Talbi
Elliot L. Hendler	Mitchell J. Mertz	Elizabeth K. Venuti
Joel Lanz	Mark Mycio	Paul J. Wendell
Michele M. Levine	Eric J. Rogers	Margaret A. Wood
Thomas O. Linder		

NYSSCPA Staff

Robert H. Colson

new york state society of

NYSSCPA

certified public accountants

Home of the Trusted Professional

3 park avenue, at 34th street, new york, ny 10016-5991
212.719.8300 • fax 212.719.3364
www.nysscpa.org

The New York State Society of Certified Public Accountants

**Comments on
Exposure Draft:**

**Proposed Statement on Standards for Accounting and Review Services
(SSARS), *RESTRICTING THE USE OF AN ACCOUNTANT'S
COMPILATION OR REVIEW REPORT***

June 20, 2005

Principal Drafters

**Ira M. Talbi
Joseph A. Maffia
Michael J. Aroyo**

**THE NEW YORK STATE SOCIETY OF CERTIFIED PUBLIC ACCOUNTANTS
ACCOUNTING AND REVIEW SERVICES COMMITTEE'S COMMENTS
ON**

**PROPOSED STATEMENT ON STANDARDS FOR ACCOUNTING AND
REVIEW SERVICES:
*RESTRICTING THE USE OF AN ACCOUNTANT'S COMPILATION OR REVIEW
REPORT***

June 20, 2005

General Comments

The Committee appreciates the opportunity to comment on the proposed SSARS. Except as noted below, the proposed changes improve services offered by CPAs.

Specific Comments

Comment 1, Page 7, Paragraph 7, General-Use Report included with Restricted Use:

The proposed change states that the inclusion of a separate restricted-use report in a document that contains a general-use report does not affect the intended use of either report.

We suggest a clarification that when a document contains both a general-use report and a separate restricted use report then that document be restricted. This approach would not preclude issuing a separate report on the general-use statements.

Comment 2, Page 8, Paragraph 10, Limiting the Distribution of Reports:

The proposed change states that an accountant should consider informing the client that restricted-use type reports are not intended for distribution to nonspecified parties.

We suggest the following revision: "...an accountant should inform his or her client that restricted-use type reports are not intended for distribution to nonspecified parties."

Comment 3, Page 8, Paragraph 10 Limiting the Distribution of Reports:

If the accountant becomes aware that the financial statements have been distributed to third parties that are not specified users, then, as permitted with SSARS No.

8 engagements, the accountant should be allowed to notify known third parties that the financial statements are not intended for third-party use.