



United States Steel Corporation
600 Grant Street
Pittsburgh, PA 15219-2800
412 433 4961
412 433 1131 Fax
grhaggerty@uss.com

Gretchen R. Haggerty
Executive Vice President, Treasurer &
Chief Financial Officer

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Office of the Secretary
Public Company Accounting Oversight Board
1666 K Street, NW
Washington, C 20006-2803

Subject: PCAOB Rulemaking Docket Matter No. 008

Ladies and Gentlemen:

These comments are submitted on behalf of United States Steel Corporation in response to the Proposed Auditing Standard, *An Audit of Internal Control Over Financial Reporting Performed in Conjunction with an Audit of Financial Statements*, (the Proposed Standard) contained in PCAOB Release No. 2003-017.

United States Steel Corporation supports and commends the PCAOB as it continues its rigorous efforts to implement new rules and regulations to improve the quality of audits, and thus their utility to investors. We offer the following comments with regard to the Proposed Standard.

With respect to the second to last paragraph preceding Question 11, although not stated directly, we are interpreting this paragraph to imply that if testing is performed earlier in the year, management, as well as the auditor, must perform additional testing at the end of the fiscal year. We feel that this would place an onerous burden on management and should not be required unless a change had occurred to materially impact reliance on the previous testing.

With respect to Question 17, we consider the use of the term "more than a remote likelihood" to be overly restrictive and having the potential to inappropriately render control deficiencies as significant and weaknesses as material. The word "remote" may move the bar so low that it is possible that all but an absolute lack of likelihood could be construed as more than remote. AU 325 defines a material weakness as a condition in which the design or operation of one or more of the internal control components does not reduce to a relatively low level the risk that misstatements caused by error or fraud in amounts that would be material in relation to the financial statements may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. We believe that this definition of a material weakness should be maintained.

We appreciate the opportunity to comment on the proposed statement. If you have any questions on our comments, please feel free to call me at (412) 433-4961 or Richard Belasco at (412) 433-5642.

Sincerely,

s/Gretchen R. Haggerty