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**From:** Michael Howard [MHoward@auditor.state.oh.us]  
**Sent:** Monday, December 01, 2003 4:11 PM  
**To:** Comments  
**Subject:** Docket 012

Having worked with GAAS for 30 years and GAGAS for 24, I believe the GAGAS standard of documentation is appropriate.

Specific comments:

--I suggest the PCAOB define the firms' budget and time summaries and their internal payroll records as being subject to this rule. If work was performed and paid for by the clients, then there should be documentation in the working papers supporting that work done and conclusions reached. Without access to those BATS and payroll records, the reviewers may not know that such work was performed. Firms are reluctant to share that data with reviewers, however, I would consider it essential to the PCAOB's work.

--Footnote 3 - under what circumstances does the Board contemplate there being no report? Auditor withdrawal from the engagement? I think you could better define the date of "substantial completion" by reference to some known date, such as the firm's indicated date of withdrawal.

--Paragraph 16: these files could be huge. Is the Board speaking of other independent auditors, which is the subject of your other proposed rule? Specialists may not share all their work with the firm - did you contemplate having those somehow kept by the firms too? If so, how?

--This proposed rule and the other one both refer to AICPA AU sections. This could make it cumbersome to change your rules if the AICPA edits those sections. I suggest you consider either quoting those sections, if legally possible, or put a date on them, such as "AU sec 543 [12/01/03]".

These are my comments, and do not necessarily reflect the views of the Auditor of State of Ohio.

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12/1/03

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