



FLORIDA INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS

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Office of the Secretary, PCAOB
1666 K Street, N.W.
Washington, D.C. 20006-2803

RE: Proposed Auditing Standard – Reporting on the Elimination of a Material Weakness
(PCAOB Rulemaking Docket Matter No. 018)

The Accounting Principles and Auditing Standards Committee of the Florida Institute of Certified Public Accountants (the Committee) has reviewed and discussed the above referenced “proposed auditing standard.” The Committee has the following comments:

First, the Committee feels that the sample auditor’s report included in the proposed standard does clearly describe the results of the engagement.

Second, the Committee does not believe the proposed standard should require the auditor’s report to specifically identify any other additional material weakness identified during the most recent audit of internal control, but which have not been corrected. The Committee feels such additional information would detract from the reporting on the material weakness, which had been corrected. In addition, since the material weaknesses have already been reported on as part of the most recent audit of internal control, there is no need to report on the uncorrected material weaknesses again.

Lastly, the standard should not allow a report on the elimination of a material weakness, in which the material weakness was identified and eliminated by management as of an interim date. The reporting requirements under Section 404, as well as this proposed standard appear to be sufficient to describe material weaknesses identified and if applicable, corrected.

The Committee appreciates this opportunity to share our views and concerns. Members of the Committee are available to discuss any questions you may have regarding this communication.

Very truly yours,

Kathryn M. Means, CPA, Chairman
FICPA Accounting Principles and Auditing Standards Committee

Committee members coordinating this response:

Lillian Conrad
Randy Dillingham