



# FLORIDA INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS

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February 23, 2012

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

Re: Exposure Draft – *Proposed Auditing Standard Related to Communications with Audit Committees, Related Amendments to PCAOB Standards and Transitional Amendments to AU Sec. 380*

Dear Sirs:

The Accounting Principles and Auditing Standards Committee (the “Committee”) of the Florida Institute of Certified Public Accountants (“FICPA”) has reviewed and discussed the subject exposure draft. The Committee has the following responses to the questions set forth in Section VI of the Exposure Draft:

1. The Committee agrees that the communication requirements in the new proposed standard are appropriately aligned with the performance requirements in the risk assessment standards.
2. The Committee did not note any specific additional matters based on existing auditor performance obligations that should be communicated to the audit committee. However, certain members of the Committee requested that additional guidance be provided in the proposed standard regarding this issue.
3. Regarding the requirement to have the engagement letter executed by the appropriate party or parties on behalf of the company:
  - a) The Committee agrees that the requirement in the standard is clear.
  - b) The Committee believes that the acknowledgement by the audit committee should be in written form rather than an oral acknowledgement, as allowed by the proposed standard, and also believes that audit committees, in general, would be more comfortable with a written acknowledgement. The Committee noted that the engagement letter should be reviewed and discussed by the audit committee, as logistically practical, and that the audit committee chair should sign on behalf of the audit committee.
4. The Committee agrees that the requirement for the auditor to communicate significant unusual transactions to the audit committee is appropriate and noted that this corresponds with the requirements of Statement on Auditing Standards No. 114.
5. The Committee agrees that there are circumstances when the auditor is aware that management has consulted with other accountants regarding significant accounting or auditing matters and the auditor has identified a concern regarding these matters. The Committee believes that the requirement for the auditor to communicate to the audit committee his or her views regarding such matters is appropriate.
6. The Committee agrees that the amendments to the other PCAOB standards are appropriate.

7. Regarding the audits of brokers and dealers:

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- a) The Committee agrees that, if audits of brokers and dealers are to be performed under PCAOB standards before the new proposed standard becomes effective, the communication requirements under interim standard AU Sec. 380 should be applicable to these brokers and dealers. However, the Committee believes that these communication requirements should be applicable to all brokers and dealers only if all of them are to be audited in accordance with PCAOB standards.
- b) Similar to the response to Question 7a above, the Committee believes that the auditor's communications to audit committees included in the new proposed standard should be applicable to all audits of brokers and dealers only if all of them are to be audited in accordance with PCAOB standards.
- c) The Committee does not believe that there are any communication requirements specific to audits of brokers and dealers that should be added to the new proposed standard or, alternatively, that there are any communication requirements contained in the new proposed standard that should not be applicable to these audits.

The Committee appreciates this opportunity to comment on the subject exposure draft. Members of the Committee are available to discuss any questions regarding this response.

Respectfully submitted,

Robert Bedwell, Chair  
FICPA Accounting Principles and Auditing Standards Committee

Committee members coordinating this response:

Robert Bedwell, CPA  
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