



1800 Gateway Drive, Ste 200  
San Mateo CA 94404-4072  
(800) 922-5272  
www.calcpa.org

February 8, 2011

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

Re: Comments Regarding PCAOB Rulemaking Docket Matter No. 32  
Proposed Temporary Rule for an Interim Program of Inspection Related to Audits  
of Brokers and Dealers

Board Members:

The Accounting Principles and Auditing Standards Committee (the AP&AS "Committee") of the California Society of Certified Public Accountants ("CalCPA") is pleased to provide our comments to the PCAOB on the proposed temporary rule for inspection of brokers and dealers.

The AP&AS Committee is the senior technical committee of CalCPA. CalCPA has approximately 35,000 members. The Committee is composed of 50 members, of whom 67 percent are from local or regional firms, 23 percent are sole practitioners in public practice, 5 percent are in industry and 5 percent are in academia. Several of our member's firms audit brokers and dealers.

The Committee supports the proposed temporary rule as it is responsive to the requirements for such a program as set forth in the Dodd-Frank Wall Street Reform and Consumer Protection Act. Ultimately, the Board will determine whether to retain an inspection program for those brokers who do not receive, handle or hold customer securities or cash or are not members of the Securities Investor Protection Corporation, based upon the results of the interim inspection program.

We thank the Board for the opportunity to comment on the proposed standard. We would be glad to discuss our opinions with the Board should they have any questions or require any additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read "JoAnn Guattery".

JoAnn Guattery, Chair  
Accounting Principles and Auditing Standards Committee  
California Society of Certified Public Accountants