

From: [Gabriel Gordon](#)
To: [Comments](#)
Subject: Rulemaking Docket No. 37
Date: Saturday, December 10, 2011 6:38:59 PM

Dear PCAOB:

I address this letter in regards to the Concept Release on Auditor Independence and Audit Firm Rotation with all due respect to the PCAOB and its members, and hope for consideration of its content and my opinion as a future auditor.

By definition, auditors have to be objective and independent when providing a quality service. I believe all processes can be improved through reevaluation and readjustment, so we can avoid becoming stagnant and complacent. I support the mandatory audit firm rotation proposal because it seems to increase the possibility of independent performance by current auditors and audit firms. Mandatory audit firm rotation will make auditors increase the quality of their work and complete audits more carefully because of the future evaluation it will be submitted to by audit competitors after rotation. The standards established by audit firms when hiring, supervising, and evaluating auditors' performance will increase as well, which represents an overall improvement of attitude and execution of the job.

Those who oppose rotation worry about the economic and production efficiency effects the proposal could have on audit firms and their clients, especially considering how much risk and stress the auditor-client relationships would go through in the early stages. It is possible that neither auditors nor their clients will adjust to these changes. It takes time to develop trust in the client-auditor relationship, learn the policies, the internal controls, and the processes. Many believe rotation will hamper the ability to execute properly because of increasing costs, capacity issues, size disadvantage to large audit firms, among other reasons. However, I believe the market will adjust to these changes mainly because it's necessary for the good of the profession. Rules should be tightened up to reduce the possibility of loopholes in the system, but mainly to keep improving auditor's critical thinking, their objectivity, and their independence.

My sole recommendation would be to rotate auditors every 5 years for audit engagements. From there on, other procedure policies can be added which will ensure the enforcement, efficiency, and functionality of the mandatory rotation.

The PCAOB has the opportunity to listen both sides regarding this issue. All audit firms, as well as individual auditors, expect to be heard and hope for the best solution for the profession to prevail.

Sincerely,

Gabriel Gordon
Louisiana State University - Accounting Student