

December 14, 2011

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

Dear PCAOB,

As the Audit Committee of Assurity Life Insurance Company, a mutually owned life insurance company, we wanted to share our perspective regarding PCAOB Release No. 2011-006 on auditor independence and audit firm rotation. We support the PCAOB's objective of ensuring auditor independence, objectivity and professional skepticism. However, we believe that mandatory audit firm rotation would result in no meaningful improvement in these areas and would come with significant cost and risk. We therefore respectfully request that the PCAOB discontinue its proposal of mandatory audit firm rotation.

Proponents argue that setting limits on the continuous stream of audit fees will "free" the auditor from management pressure. This argument is flawed at its fundamental core as, since Sarbanes-Oxley's enactment, it is the Audit Committee (not management) that has the fiduciary responsibility to hire, fire, and evaluate the performance of the audit firm. Furthermore, it should be apparent, that it is never in an Audit Committee's best interests to allow management and the auditing firm to become too closely aligned. Should an Audit Committee suspect this is happening; the Audit Committee would replace the audit firm to protect its own interests and reduce its potential liability.

In addition, the incremental external audit fees resulting from mandatory audit firm rotation, coupled with the hidden internal costs of transitioning, firms, would make this proposal a very expensive proposition. Companies will need to invest substantial time, effort and money in selecting and educating new auditors on a rotating basis. The time spent by senior management and other employees within our organization could best be directed to focusing on corporate governance, internal controls and financial reporting.

Finally, we believe that it is imperative that Audit Committees continue to have the autonomy to choose the right auditor, based on the audit firm's experience and industry knowledge, instead of being forced to choose an auditor due to a mandated requirement. Any requirement to adopt mandatory rotation would indiscriminately remove an Audit Committee's discretion to do what is in the best interest of their respective companies and customers.

We believe Audit Committees are in the best position to evaluate whether auditors are independent, objective and are exercising an appropriate level of professional skepticism.

Sincerely,



Angie Muhleisen, Audit Committee Chair