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**To:** [Comments](#)  
**Subject:** PCAOB Rulemaking Docket Matter No. 041  
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Gentlemen:

I appreciate the opportunity to comment on the PCAOB's Concept Release on Audit Quality Indicators.

The PCAOB's project to identify potential "audit quality indicators" should be halted immediately. The words "audit quality indicators" properly belong in parentheses because that is not what they represent. The "quality" of an audit to be conducted cannot be predicted, and the "quality" of a completed audit, presumably identified by such terms as good, bad, mediocre, sensational, spectacular, out-of-this world, terrible, awful, or you've got to be kidding, if measurable at all, would be highly subjective and accomplished by a thorough review of how the engagement was planned, how the engagement team was instructed and supervised during the engagement, along with a post-issuance review of audit work papers and the audit product. To this we might add such things as a firm's "tone at the top" and its relative emphasis on marketing, networking and technical competence. Quality will not be measured by 28 metrics, or 70 metrics, or 7,000 metrics.

The only potential that exists here is the potential for an incredible waste of time and energy by thousands of auditors, audit committee members, and other parties that might find themselves immersed in this nonsense. Audit committees can meet their responsibilities to evaluate an audit firm by asking four or five questions. They don't have to know if the firm's proofreader worked and played well with others in kindergarten. I suggest that the PCAOB and its staff turn its considerable expertise to efforts that will be of assistance to auditors and improve audit results. A good beginning would be a reconsideration of auditing standards relating to risk assessment and related audit procedures, and tests of control, with the goal of simplification, and doing away with the vast chasm that appears to exist between how auditors and the PCAOB think those standards should be applied.

I hope you will come to realize that the project is not something that is needed. Too many resources have already been expended on it.

Sincerely,  
Elliot L. Hendler, CPA

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