

COMMENTARY

Auditing Standards Committee Comment Letter Proposed Statement on Auditing Standards— *External Confirmations*

Participating Committee Members

Randal J. Elder, James L. Bierstaker, Paul Caster, Diane Janvrin, and Brad J. Reed

INTRODUCTION

The Auditing Standards Committee of the Auditing Section of the American Accounting Association is pleased to provide comments on Proposed Statement on Auditing Standards—*External Confirmations* (AICPA 2009). The views expressed in this letter are those of the members of the Auditing Standards Committee and do not reflect an official position of the American Accounting Association. In addition, the comments reflect the overall consensus view of the Committee, not necessarily the views of every individual member. We hope that our attached comments and suggestions are helpful and will assist in finalizing the proposed standard.

GENERAL COMMENTS

The Committee commends the Auditing Standards Board (ASB) for revising the audit standard on external confirmations to address changes in technology since SAS No. 67 (AICPA 1992) was adopted, and the continuing efforts to apply clarity drafting conventions and converge with International Standards on Auditing (ISAs). The following comments address the specific questions in the guidance for respondents.

Specific Comments Addressing ASB-Proposed Questions

(1) Are the Objectives of the Auditor Appropriate?

The committee believes that the objectives of the standard are appropriate. Additional comments that follow address the reliability of confirmations and when they should be applied.

(2) Are the Revisions Made to Converge the Existing Standard with ISA 505 Appropriate?

As noted by the Audit and Attest Standards staff, the primary difference between the requirements of the proposed standard and ISA 505 (IAASB 2009) are the presumptive requirement to confirm accounts receivable. The Committee agrees that this requirement is appropriate for the U.S. environment, particularly to address the existence assertion. Revenue recognition concerns identified in SAS No. 99 (AICPA 2002) and in Beasley et al. (1999), including special terms and the use of side agreements, suggest the continued need for confirmations as part of the audit. We recommend that the standard include explanatory language that explains the presumptive requirement for accounts receivable confirmations. For example, Paragraph 19b in the conforming

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**United States. Securities and
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