



American Institute of CPAs
1211 Avenue of the Americas
New York, NY 10036-8775

November 12, 2015

IFRS Foundation Trustees
30 Cannon Street
London EC4M 6XH, United Kingdom

Dear Trustees:

The American Institute of Certified Public Accountants is pleased to offer its comments on the *Trustees' Review of Structure and Effectiveness: Issues for the Review*. The AICPA is the world's largest member association representing the accounting profession, with more than 412,000 members in 144 countries, and has a history of serving the public interest since 1887. AICPA members represent many areas of practice, including business and industry, public practice, government, education and consulting.

Our comments are in the context of the Foundation's focus described in paragraphs 6-8 of the Review, meaning we did not revisit the Foundation's four primary strategic goals.

Overall the AICPA supports the Foundation's views on the issues identified in the Review. Following are our specific points of emphasis on certain questions in the Review.

Q1 - We believe that private, not-for-profit organizations are an important constituency of financial reporting and that the International Accounting Standards Board should extend its remit to that sector.

Q2 - We agree that IASB should play an active role in developments in wider corporate reporting through the co-operation outlined in paragraphs 27 and 28 of the Review. We believe that although financial statements prepared under IFRS serve as a fundamental foundation, they do not by themselves sufficiently communicate how companies create value in the short, medium and long term. We support the efforts of the International Integrated Reporting Council to develop a voluntary framework for corporate reporting that complements traditional financial reporting, and we believe the IASB can play a critical role in the evolution of corporate reporting through

continued involvement in the efforts of the IIRC, and consideration of how the Integrated Reporting Framework can support meaningful disclosure through management commentary and other appropriate channels.

Qs 3 & 5 - We support the Foundation's goal of having the IFRS Taxonomy recognized as the globally agreed standard to tag and intelligently structure financial information, and applaud your proactive efforts to consider taxonomy implications in developing new standards. We encourage the IASB to continue the process of seeking public input in the development process of the taxonomy so that the needs of different types of users around the world can be addressed. We agree that although it is likely that the IFRS Taxonomy will continue to be the best way to support the users of structured data, given the pace of technological innovation it would be worthwhile for the IASB to establish a network of experts to monitor and make recommendations related to new developments in technology that are relevant to IASB.

Q14 - The AICPA urges the Foundation to continue its efforts to find a permanent funding solution for the IASB's activities. In addition to ensuring that the IASB has appropriate resources to carry out its mission, this solution will result in increased world-wide confidence in the IASB's role as an independent accounting standard setter. Further, to avoid misperceptions, it is important that the funding comes from geographically diverse sources.

In the United States, we encourage the Securities and Exchange Commission to find a permanent U.S. funding source for the IASB. In this regard, we note that foreign private issuers prepare financial statements in accordance with IFRS for purposes of listing on U.S. exchanges. We also stress the fact that vast amounts of U.S. citizen investments are in foreign entities that use IFRS for their financial reporting.

The AICPA appreciates the opportunity to submit its comments and would be pleased to discuss them with you at your convenience.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susan Coffey".

Susan Coffey, CPA, CGMA

AICPA Senior Vice President

Public Practice & Global Alliances