March 19, 2012

To the Members of the United States Senate:

On behalf of the 377,000 members of the American Institute of Certified Public Accountants, I am writing to you today with regard to the importance of maintaining an independent accounting standard setter and insuring that accounting and auditing standards apply uniformly to all public companies. Both of these concepts are critical to protecting investors’ interests and ensuring that there is clarity, objectivity and transparency in public company financial reporting. These principles should guide policymakers with regard to public company financial statements and audit requirements.

The purpose of public company financial reporting is to provide investors and other users of public company financial statements with clear, objective, and transparent financial information. An independent accounting standard setter enhances confidence in the transparency of information that investors receive, thus serving as an essential foundation of our capital markets. Any attempt to divert public company financial reporting from its primary focus and objectives to other policy objectives damages investor protections. If public companies were not treated uniformly, investors would have great difficulty distinguishing between the differing accounting treatments, and in many cases, may be unable to do so at all. Consequently, they would be unable to compare accurately the financial condition of different public companies.

Creating a policy that would allow for different accounting standards for different classes of public companies, such as between emerging growth companies and other public companies, would create marketplace and investor confusion by allowing different accounting standards to be applied at different points in a publicly-traded company’s lifecycle. We believe strongly that consistency in applying accounting standards for all public companies is vital to investors, along with clear, objective and transparent financial information.

Congress should also use these same guiding principles when considering changes to audit rules. Requiring different auditing rules for different classes of companies within the public company market creates complexity and compliance difficulties. And more importantly, as with the dual accounting requirements discussed above, we believe this would also create unnecessary confusion for investors of public companies.

Again, please consider the importance of maintaining an independent accounting standard setter and ensuring that accounting and auditing standards apply uniformly to all public companies before enacting any changes to accounting and auditing rules.

Thank you for your consideration of our concerns.

Sincerely,

Barry C. Melancon, CPA
President and CEO