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Government Relations
Office

100 Pine Street
Suite 275
Harrisburg, PA 17101-1206
(717) 232-1821
fax (717) 232-7708
fax-on-demand (215) 496-9336
<http://www.picpa.org>
E-mail: info@picpa.org



Pennsylvania Institute of
Certified Public Accountants

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MAR 25 2005

DOS LEGAL COUNSEL

March 24, 2005

Steven Wennberg, Counsel
State Board of Accountancy
Commonwealth of Pennsylvania
P. O. Box 2649
Harrisburg, PA 17105-2649

Re: General Revision Regulations 16A-559

Dear Mr. Wennberg:

On behalf of the 19,000 members of the Pennsylvania Institute of Certified Public Accountants, thank you for the opportunity to comment on the proposed general revision regulations (16A-559) promulgated by the State Board of Accountancy. Our comments follow below.

1. **11.1. Definitions.**
The terms "SSAEs—Statement on Standards for Attestation Engagements" and "PCAOB—Public Company Accounting Oversight Board" should be added to this section. Incorporating SSAEs, which includes all other attestation standards, is simply clarifying the existing regulation. The PCAOB only came into existence with the passage in 2002 of the federal Sarbanes-Oxley Act, therefore it is a relatively new standard-setting agency that may not have been contemplated as the Board was developing this rulemaking.
2. **11.21. Independence.**
The Public Company Accounting Oversight Board (PCAOB) should be added to the list of agencies as public or private standard-setting bodies.
3. **11.55. Experience requirements for CPA certification.**
Section 11.55(b)(1)(i) should read "Audits of financial statements in accordance with GAAS, GAGAS or PCAOB."

Section 11.55(b)(1)(iv) should read "Attestation engagements in accordance with SSAEs." With this change, we see no need to delineate the other examples as proposed in this section as they are all covered in accordance with the Statement on Standards for Attestation Engagements (SSAEs).

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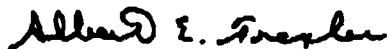
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A new Section 11.55(b)(1)(v) should be added to read, "Other auditing in accordance with accepted standards that leads to the expression of a written opinion."

4. 11.56. Supervision of experience: verification.
There is a misspelling of the word "willfully" in new subsection (c).

Once again, thank you for the opportunity to review and comment on these proposed regulations. Should you desire additional information or feel the need to meet with representatives of the PICPA, please do not hesitate to contact me.

Sincerely,



Albert E. Trexler, CAE
CEO and Executive Director

cc: Senator Robert "Tommy" Tomlinson, Chair, Consumer Protection and Professional
Licensure Committee
Senator Lisa M. Boscola, Democratic Chair, Consumer Protection and Professional
Licensure Committee
Rep. Thomas P. Gannon, Chairman, House Professional Licensure Committee
Rep. William W. Rieger, Democratic Chairman, House Professional Licensure Committee