



BROWN-FORMAN

PHOEBE A. WOOD
EXECUTIVE VICE PRESIDENT,
CHIEF FINANCIAL OFFICER

November 19, 2003

Office of the Secretary
PCAOB
1666 K Street, N.W.
Washington, D.C. 20006-2803

Reference PCAOB Rulemaking Docket Matter No. 008

Dear Members of the Board:

Thank you for your invitation to comment on PCAOB Rulemaking Docket Matter No. 008. As the Chief Financial Officer of a large NYSE listed company, I strongly believe I can offer unique insights into specific issues in your proposed auditing standard.

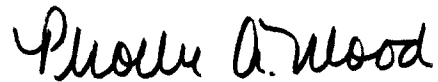
In general, I believe that adoption of the recommendations outlined in your proposed standard would be of significant value in strengthening corporate governance and the audit process to enhance public trust in the integrity of financial reporting systems. However, I take strong exception to the direction you propose in Appendix A, paragraphs 79 and 80.

Paragraph 80 specifically states that the auditor walkthroughs should encompass “the entire process of initiating, recording, processing and reporting individual transactions.” Paragraph 79 states that “the auditor should trace **all** types of transactions and events, both recurring and unusual, from origination through the company’s information systems until they are reflected in the company’s financial reports.”

The amount of work required by this standard is unnecessary and unproductive. Within any significant process, such as the revenue

cycle, there are many types of transactions and events, some more significant than others. It is my understanding and belief that the intent of Sarbanes-Oxley section 404 is to document and test the **significant** processes, transactions, and **key** controls that are relevant to the company's financial statements. Tracing and testing of all types of transactions and controls is overly burdensome and cost-prohibitive.

Sincerely,

A handwritten signature in black ink that reads "Phoebe A. Wood". The signature is written in a cursive, flowing style.

Phoebe A. Wood