From: Mike Stevenson [Mike@armcpa.com]

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To: Comments

Subject: Docket # 017

My comment surrounds the definition of routine as related to the new rules on auditor independence and tax services. Defined as not routine is "prepares individual tax returns for client company officers with oversight authority over financial statements." Would this apply to an auditor who only performs audit work related to the company's 11-K and prepares the VP-Human Resources individual tax return? The VP-HR signs the 11-K representation letter.

Mike Stevenson Ary, Roepcke & Mulchaey 614-486-3600 office 614-554-2295 cell