

July 23, 2007

Office of the Secretary  
Public Company Accounting Oversight Board  
1666 K Street, N.W.  
Washington, DC 20006

VIA EMAIL: [comments@pcaobus.org](mailto:comments@pcaobus.org)

**Re: PCAOB Rulemaking Docket Matter No. 24: Proposed Amendments to Limit Board Rule 4003's Fixed Periodic Inspection Requirement to Firms that Regularly Issue Audit Reports**

Dear Sir:

PricewaterhouseCoopers is pleased to comment on the above referenced Rulemaking Docket Matter. We are responding on behalf of the network of member firms of PricewaterhouseCoopers International Limited, each of which is a separate and independent legal entity.

We support the willingness of the Public Company Accounting Oversight Board ("PCAOB") to apply its experiences during the first several years of performing inspections and propose appropriate changes to Board Rule 4003. We believe the proposed changes properly consider the risk-based focus the PCAOB brings to bear in allocating its inspection resources. We support, as consistent with this risk-based approach, the PCAOB's proposal to 1) eliminate its requirement that it regularly inspect each registered public accounting firm that plays a substantial role in the preparation of furnishing an audit report but does not issue a report, and 2) eliminate its requirement to conduct an inspection of any firm that has issued an audit report, even if the firm does not regularly issue audit reports.

The proposed rule change would support and facilitate the PCAOB's efforts in relation to non-U.S. inspections. Appropriate and effective cooperation with the regulatory agencies of other countries can result in further benefits to the PCAOB's inspection process, accounting firms, and investors. We believe this proposal will allow the PCAOB to concentrate its inspections where they will do the most good for the investing public. We note that the rule as proposed would in no way alter the authority of the PCAOB to inspect any registered firm, including "substantial role only" firms. Accordingly, we support the changes to Rule 4003 as proposed.



We would be pleased to discuss our comments and answer any questions that the PCAOB staff or Board may have. Please contact Richard R. Kilgust at (646) 471-6110 if you have any questions about our submission.

Sincerely,

PricewaterhouseCoopers