



Paris, 01/12/2011

Office of the Secretary
Public Company Accounting Oversight Board
1666 K Street, NW
Washington DC 20006-2803
USA

Email: comments@pcaobus.org

Re: PCAOB Rulemaking Docket Matter No. 37: Concept Release on Auditor Independence and Audit Firm Rotation

Dear Sir, Madam,

FIDEF is pleased to provide you with its comment on the PCAOB Rulemaking Docket Matter No. 37 "Concept Release on Auditor Independence and Audit Firm Rotation".

In answer to questions 6 and 7 of the aforementioned Docket Matter would like to draw the PCAOB's attention to the issues arising from the application of an audit firm rotation in an absolute manner affecting all subsidiaries of a company governed by the laws of a certain jurisdiction.

Indeed, in some specific cases, there is at the moment in certain countries no viable alternative to the audit firm currently in charge of the audit of a number of subsidiaries, *i.e.* a firm which has the necessary skills and expertise to perform an audit of a high quality of the relevant type of company (taking its sector of activities into account, etc.). Only such an audit firm can, in accordance with the International Standards on Auditing, succeed to the audit firm in place in order to carry out the engagement.

Any requirements imposed by the PCAOB with regard to rotation affecting subsidiaries should therefore provide for an exemption in those specific circumstances based on well-founded grounds that can be ascertained.

Yours sincerely,

Michèle Cartier – Le Guérinel
Délégué générale de la FIDEF

Michel De Wolf
President de la FIDEF