



December 14, 2011

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

Via e-mail: [comments@pacobus.org](mailto:comments@pacobus.org)

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

Dear Mr. Seymour:

As Chairman of the Audit Committee of WESCO International, Inc. ("WESCO"), a publicly traded Fortune 500 company headquartered in Pittsburgh, Pennsylvania, I am responding on behalf of the Audit Committee to the PCAOB's request for comment on the concept release regarding mandatory audit firm rotation. After careful consideration, we do not believe that mandatory firm rotation would protect investors or enhance audit quality.

Current regulations regarding audit partner rotation and evaluation of an audit firm by a company's audit committee are appropriate to ensure auditor independence, objectivity and professional skepticism. WESCO's Audit Committee takes its responsibilities under the current regulations seriously and believes that the Audit Committee is in the best position to evaluate an audit firm and the terms of audit engagements. Mandatory firm rotation would inappropriately limit the Audit Committee's discretion in hiring and evaluating independent auditors.

Mandatory firm rotation may also adversely affect the quality of audits, as a new auditor would not have the institutional knowledge necessary to perform effective and efficient audits. An incumbent auditor with company-specific knowledge and familiarity is more effective than an auditor in the early years of an engagement who does not have such a detailed and in-depth understanding of the company's business and its operations. The cost, in both time and money, associated with researching, selecting and educating new auditors on a rotating basis is likely to be a significant burden. Mandatory firm rotation would considerably increase the costs of audits because of the duplication of the start-up and learning time required for a new audit firm to gain familiarity with a company necessary to conduct an efficient and effective audit.

Mandatory audit firm rotation would also complicate the process of selecting and engaging which firms perform non-audit services, as these services would need to be re-evaluated each time the audit firm changes. For all of these reasons, we do not support mandatory audit firm rotation. We appreciate the opportunity to express our concerns and hope that the PCAOB does not proceed with this proposed approach.

Sincerely,

  
Robert Tarr  
Chairman of the Audit Committee