



December 16, 2011

Office of the Secretary
Public Company Accounting Oversight Board
1666 K Street, NW
Washington, D.C. 20006

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

TrueBlue, Inc. has reviewed the Concept Release on Auditor Independence and Audit Firm Rotation (the “Release”) issued in August 2011, and we appreciate the opportunity to comment on the Release.

TrueBlue, Inc. is an international company that operates in 50 states and Canada, providing business customers with temporary blue-collar staffing services. Our annual revenues total approximately \$1.4 billion, and we serve more than 175,000 customers. Our financial statements are prepared under U.S. GAAP and filed with the Securities and Exchange Commission, and we are registered with the New York Stock Exchange. We have an experienced, inquisitive and diligent audit committee comprised of members who are designated as “independent” under the requirements of the NYSE.

As a sophisticated user of audit services with the highest standards of corporate governance, we see no value in mandatory audit firm rotation as a means to improve audit quality. To the contrary, we view this proposal as a material detriment to audit quality, efficiency and cost. We present our views in the following discussion.

The process of changing audit firms is costly and disruptive; it takes several years for the new auditor to establish familiarity with a company’s systems, personnel, and business activities to appropriately assess risk and optimize audit effectiveness. Strong institutional and industry-specific knowledge is required to understand the complexities of a large business and the related nuances in accounting practices; this, combined with the short time-cycle in place for financial reporting, make it extremely difficult for audit firms to be effective and efficient after a short tenure with a client.

During our 2009 fiscal year, we changed auditors from PricewaterhouseCoopers LLP to Deloitte & Touche LLP. Although we were presented with an audit team of highly experienced auditors and industry experts, we nevertheless experienced firsthand the significant challenges and substantial learning curve that inevitably occur with a new auditor. This experience informs our view that audit firm rotation is not a simple process.

Oversight of Independent Audit Firms

We believe the current standards for mandatory partner rotation, combined with the independent partner review process, the audit firms' internal inspection process, and the PCAOB inspection process, provide adequate and effective assurance over the integrity of auditor skepticism and objectivity. It has been our experience that new rotating partners from the incumbent audit firm challenge the status quo of their client's accounting and the audit process, provide a fresh set of eyes, and incorporate new perspectives into the evaluation of key accounting judgments. With the institutional experience of a tenured audit team, new partners can provide these perspectives without compromising the quality of the rest of the audit process. We believe that this audit partner rotation provides a value equivalent to audit firm rotation.

Audit Quality

We believe that mandatory audit firm rotation has the potential to increase the adversarial nature of the auditor-client relationship to the detriment of investors. Most controversial accounting and auditing issues arise during the quarterly financial reporting process, which is subject to a short time-frame. The hallmark of an effective audit includes candid and open conversations between auditors and clients to timely identify and resolve accounting and auditing issues. In our experience, the familiarity between the audit firm and its client, which is developed over a number of years and interactions, improves the level of candor and the timeliness of the audit process. Therefore, mandatory audit firm rotation may be at odds with increasing the speed at which registrants can provide information to investors.

We agree that the auditing profession and the PCAOB inspection process must be subject to a continuous improvement model to continue to meet the needs of investors. However, the broad nature of the proposal in the Release seeks to unduly burden the entire accounting profession for certain isolated incidents of audit failure. We strongly believe that the mandatory audit firm rotation concept is misguided and not in the best interests of registrants, the investing community, the auditing profession or even the PCAOB itself. We believe that the PCAOB would be most effective in improving audit quality by continuing to enforce the existing rules. This should not be construed as a suggestion for the PCAOB to be more aggressive in the inspection process relative to routine audit deficiencies, since addressing routine audit deficiencies in a constructive manner is an essential component of an efficient continuous improvement process.

We appreciate the opportunity to comment on the Release and thank you for your consideration of our comments. Should you have any questions, please contact Craig Tall at (206) 963-8580.

Sincerely,

/s/ Craig Tall
Craig Tall
Chairman
Audit Committee

/s/ Bonnie Soodik
Bonnie Soodik
Member
Audit Committee

/s/ Gates McKibbin
Gates McKibbin
Member
Audit Committee

/s/ Derek Gafford
Derek Gafford
Chief Financial Officer