

From: Abraham Akresh <abeakresh@gmail.com>
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To: Comments
Subject: [EXT]: Attestation standards

I commend the PCAOB for beginning a much needed revision of the attestation standards. Nineteen years is far too long to revise standards.

The AICPA has clarified and revised its attestation standards; the international standards have also been clarified and revised. I suggest that the PCAOB immediately adopt the clarified attestation standards as interim revised attestation standards. Then the PCAOB can take its time to revise the standards.

Although the AICPA has asked for data on the extent of engagements under its attestation standards, the PCAOB should realize that many attestation engagements are being done under AICPA or international standards or under standards not written by accountants. An important area for attestation engagements is reporting of Environmental, governance and sustainability (ESG) matters. ESG engagements are probably being done by consultants and engineers under their standards. Thus, the PCAOB needs data on the extent of attestation engagements, including ESG engagements, under all standards. An important ESG issue is determining materiality for these engagements.

Sincerely,

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