

February 15, 2016

Brent J. Fields  
Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

**Re: PCAOB: Notice of Filing of Proposed Rules on Improving the Transparency of Audits: Rules to Require Disclosure of Certain Audit Participants on a New PCAOB Form and Related Amendments to Auditing Standards (Release No. 34-77082; File No. PCAOB-2016-01)**

Dear Mr. Fields:

CFA Institute<sup>1</sup>, appreciates the opportunity to comment on the [Notice of Filing of Proposed Rules on Improving the Transparency of Audits: Rules to Require Disclosure of Certain Audit Participants on a New PCAOB Form and Related Amendments to Auditing Standards \(SEC Proposed Rule\)](#).

CFA Institute is comprised of more than 130,000 investment professional members, including portfolio managers, investment analysts, and advisors, worldwide. CFA Institute seeks to promote fair and transparent global capital markets, and to advocate for investor protections. An integral part of our efforts toward meeting those goals is ensuring that the quality of corporate financial reporting and disclosures provided to investors and other end users is of high quality.

CFA Institute strongly recommends that the Securities and Exchange Commission (SEC) approve without delay, the issuance of the PCAOB Proposed Standard (PCAOB Proposed Standard): [Improving Transparency Through Disclosure of Engagement Partner and Certain Other Participants in Audits](#). We believe that the SEC Proposed Rule provides compelling and ample evidence that the PCAOB Proposed Standard improves transparency regarding the engagement partner and other accounting firms that participate in issuer audits. Investors who pay for the independent audit and who are the principal beneficiaries of the audit have been asking for this disclosure for years. Investors believe that requiring the disclosure of the engagement partner's name will heighten their sense of accountability and responsibility and therefore improve audit quality. Enhanced audit quality is essential for investors and other stakeholders who rely on the independent audit.

We agree with the PCAOB's view that the final rules and amendments to its auditing standards will further their mission of protecting the interests of investors and furthering the public interest in the preparation of informative, accurate, and independent audit reports. Furthermore, we commend the PCAOB for its diligent work in considering a wide range of views and alternatives on this matter and by ultimately bringing this to a conclusion.

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<sup>1</sup> With offices in Charlottesville, New York, Brussels, Hong Kong, Mumbai, Beijing and London, CFA Institute is a global, not-for-profit professional association of more than 130,000 investment analysts, portfolio managers, investment advisors, and other investment professionals in 150 countries, of whom nearly 123,000 hold the Chartered Financial Analyst® (CFA®) designation. The CFA Institute membership also includes 144 member societies in 69 countries and territories.



For further elaboration of our views we provide references to our comment letters filed with the PCAOB over the last years below:

*Supplemental Request for Comment: Rules to Require Disclosure of Certain Audit Participants on a New PCAOB Form (PCAOB Rulemaking Docket Matter No. 029)- August 31, 2015*

*Proposed Amendments to PCAOB Auditing Standards to Provide Disclosure in the Auditor's Report of Certain Participants in the Audit-March 13, 2014*

*Concept Release on Requiring the Engagement Partner to Sign the Audit Report- January 23, 2012*

If the SEC have questions or seek further elaboration of our views, please contact either Matthew M. Waldron by phone at [REDACTED], or by e-mail at [REDACTED] or Sandra J. Peters by phone at +1 [REDACTED], or by e-mail at [REDACTED]

Sincerely,

*/s/Sandra J. Peters*  
Sandra J. Peters, CPA, CFA  
Head, Global Financial Reporting Policy  
Standards & Advocacy Division  
CFA Institute

*/s/ Ashwinpaul Sondhi*  
Ashwinpaul Sondhi  
Chair  
Corporate Disclosure Policy Council

cc: James R. Doty, Chairman, PCAOB  
Martin F. Baumann, Chief Auditor and Director of Professional Standards, PCAOB  
Kurt Schacht, Managing Director, CFA Institute – Standards & Advocacy Division