1 April 2004

RIO TINTO

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Mr Jonathan G Katz
Secretary
Securities and Exchange Commission
450 Fifth Street, N.W.
Washington, D.C.
20549-0609

Dear Mr Katz

FIRST TIME APPLICATION OF INTERNATIONAL FINANCIAL REPORTING STANDARDS ('IFRS') – FILE NUMBER ~~S7-13-04~~ S7-15-04

We refer to the SEC's recent proposal on the above subject.

The adoption of IFRS will absorb a great deal of time, cost and resource for all affected companies. This is particularly so as international standards were only finalised at the end of 2003 and some standards that will be mandatory for 2005 were not finalised until 31 March 2004. Restatement of 2003 financial statements to IFRS for the purposes of the 2005 20F filing would divert effort away from the primary objective of a smooth transition at 1 January 2005.

We would like to place on record our appreciation of the SEC's proposed amendments to Form 20F for the year in which IFRS is adopted, which will facilitate the IFRS transition. In our view, the proposed additional disclosures are appropriate and will provide adequate information to investors.

Yours sincerely

M R Merton
Financial Controller