

January 13, 2010

Ms. Sherry Hazel
AICPA
1211 Avenue of the Americas
New York, N.Y. 10036-8775

By e-mail: shazel@aicpa.org


Re: Proposed Statements on Auditing Standards, Terms of Engagement and Written Representations

Dear Ms. Hazel:

The New York State Society of Certified Public Accountants, representing 30,000 CPAs in public practice, industry, government and education, welcomes the opportunity to comment on the above captioned exposure draft.

The NYSSCPA's Auditing Standards Committee deliberated the exposure draft and prepared the attached comments. If you would like additional discussion with us, please contact Robert N. Waxman, Chair of the Auditing Standards Committee at (212) 755-3400, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,



David J. Moynihan
President

Attachment



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**NEW YORK STATE SOCIETY OF
CERTIFIED PUBLIC ACCOUNTANTS**

**COMMENTS ON
PROPOSED STATEMENTS ON AUDITING STANDARDS
TERMS OF ENGAGEMENT AND WRITTEN REPRESENTATIONS**

January 13, 2010

Principal Drafter

John F. Georger, Jr.

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New York State Society of Certified Public Accountants
Auditing Standards Committee

Comments on
Proposed Statements on Auditing Standards, *Terms of Engagement and Written Representations*

The New York State Society of Certified Public Accountants welcomes the opportunity to comment on the AICPA Auditing Standards Board's (ASB) proposed Statements, *Terms of Engagement and Written Representations*.

We support the ASB's efforts to improve the clarity and reduce the complexity of auditing standards as well as its ongoing goal to converge the proposed standards with International Standards on Auditing (ISAs).

Issues for Consideration

1. In the circumstances of a recurring audit when the auditor has determined that there is no need to revise the terms of the engagement, which one of the following requirements is the most appropriate:

a. A requirement that the auditor remind the entity of the existing terms of the engagement each year (as in the proposed SAS)

b. A requirement that the auditor assess whether to remind the entity of the existing terms of the engagement each year (as in ISA 210)

We believe that the requirement that the auditor remind the entity of the existing terms of the engagement each year (as in the proposal) is most appropriate.

2. If the proposed SAS should contain a requirement to remind the entity of the existing terms, should the reminder be required to be in writing, with no option for an oral reminder?

We believe that if the proposed SAS should contain a requirement to remind the entity of the existing terms, that an option for an oral reminder should be contained in the standards, we also would concur that an oral option should be documented.

General Questions

1. Are the objectives of the auditor appropriate?

Yes.

2. Are the revisions made to converge the existing standards with ISA 333 and ISA 580 appropriate?

Yes.

3. Are the differences between the proposed SASs and ISAs upon which they are based as identified in the exhibit, and other language changes, appropriate?

Yes.

4. Have considerations for audits of smaller, less complex entities and governmental entities been dealt with appropriately?

Yes.