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Technical Director International Public Sector Accounting Standards Board International Federation of Accountants 277 Wellington Street West Toronto Ontario Canada M5V 3H2

Comments on the Proposed International Public Sector Accounting Standard, "Intangible Assets"

Dear Sir:

The Japanese Institute of Certified Public Accountants (JICPA) is pleased to comment on the Proposed International Public Sector Accounting Standard, "Intangible Assets" (the "ED"), as follows:

On "Specific Matters for Comment"

Do you agree that the changes made to IAS 38, in particular the scope exclusions set out in paragraphs 2 and 4, and the additional public sector guidance are:

- Necessary in the circumstances?
- Appropriately reflected in the revised wording?

We agree with this proposal.

Yours sincerely,

Yasuo Kameoka Executive Board Member — Public Sector Accounting and Audit Practice The Japanese Institute of Certified Public Accountants Takao Kashitani Executive Board Member — Public Sector Accounting and Audit Practice The Japanese Institute of Certified Public Accountants