



**The Japanese Institute of
Certified Public Accountants**

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April 3, 2014

Mr. James Gunn
Technical Director
International Auditing and Assurance Standards Board
International Federation of Accountants
545 5th Avenue, 14th Floor
New York, New York 10017 USA

Dear Mr. Gunn,

JICPA Comments on the Consultation Paper,
The IAASB's Proposed Strategy for 2015-2019, and
The IAASB's Proposed Work Program for 2015-2016

The Japanese Institute of Certified Public Accountants (“we”, “our”, and “JICPA”) is pleased to provide you with our comments on the Consultation Paper, *The IAASB's Proposed Strategy for 2015-2019, and The IAASB's Proposed Work Program for 2015-2016* (the proposed SWP).

We generally agree with the proposed SWP. The objective of the IAASB is to serve the public interest by setting high-quality professional standards. An ever increasing number of stakeholders involved in the public interest draw concern to the IAASB activities. We believe that the proposed SWP appropriately responds to such stakeholders' concerns and enables the IAASB to better serve the public interest.

Following are our comments in response to the questions posed by the IAASB.

Proposed Strategy for 2015–2019

Question (a)

Whether the strategic objectives identified are considered appropriate for the period 2015–2019. If not, please explain.

We believe that they are appropriate.

Question (b)

Whether the factors included in Appendix 2 on page 19 represent a reasonable basis for the IAASB to use in developing its Work Programs beyond the Work Program for 2015–2016.

Basically, we believe that they are appropriate.

Proposed Work Program for 2015–2016

Question (a)

The approach taken to the development of the Work Program for 2015–2016, in particular the IAASB's decision to focus on fewer key projects towards the goal of their completion by 2017.

We believe that the approach and decision are appropriate.

Question (b)

The appropriateness of the topics chosen as the focus for the Work Program for 2015–2016 (see paragraph 4 of the Work Program and Table A on pages 26–29) in light of the strategic objectives set out in the IAASB's Strategy for 2015–2019.

We believe that the topics are appropriate.

Question (c)

Whether there is an action(s) or project(s) that has not been included in the Work Program for 2015–2016 that you believe the IAASB should address during that period. For example, should any of the topics in Appendix 1 (on pages 39–41) be prioritized sooner? If so, which initiative(s) identified in Table A (on pages 26–29) do you believe should be replaced by this action(s) or project(s). Please provide an explanation of your views.

We would like to suggest the early redrafting of ISRE 2410, *Review of Interim Financial Information Performed by the Independent Auditor of the Entity*, cited on page 41 in Appendix 1.

ISRE 2400 (revised), *Engagements to Review Historical Financial Statements*, another standard on limited assurance engagements to historical financial information, has already been revised in accordance with the clarity format. Paragraph 65 of the Basis for Conclusions for ISRE 2400 (published in September 2012) reads as follows:

“The IAASB acknowledged that there may be some practical situations which result in questions relating to the scope of ISRE 2410. The IAASB noted that resolution of such questions would be better addressed in the context of any future project to clarify or revise ISRE 2410.”

We believe that the work of redrafting ISRE 2410 could be expected to be conducted within a relatively short period of time. Therefore, we believe that the IAASB may consider finding some space of time among important projects, in order to conduct the project to redraft ISRE 2410.

Question (d)

Whether there are alternative approaches for the IAASB to consider in order to enhance the IAASB’s ability to address calls from stakeholders for IAASB efforts on a variety of important topics, in light of the constraints of available resources and the need for due process to be applied in the development or revision of standards.

We are not prepared to express any alternative approaches at this juncture. We hope that the IAASB will further consider and propose new ideas and offer relevant explanations to stakeholders.

We hope that our views will be of assistance to the IAASB.

Sincerely yours,

Sayaka Sumida
Executive Board Member - Auditing Standards
The Japanese Institute of Certified Public Accountants