

Request for Specific Comments

143. The Board welcomes views from respondents on the following matters.

General Matters

1. Where law or regulation requires the reporting of identified or suspected NOCLAR to an appropriate authority, do respondents believe the guidance in the proposals would support the implementation and application of the legal or regulatory requirement?

Yes, provided it is believed or authority is designated, such as the Association of Professional Accountants or the equivalent in each country, with sufficient authority to protect the professional accountant of reprisals that they can exercise against people involved in the non-compliance with the relevant laws or regulations.

2. Where there is no legal or regulatory requirement to report identified or suspected NOCLAR to an appropriate authority, do respondents believe the proposals would be helpful in guiding Pas in fulfilling their responsibility to act in the public interest in the circumstances?

Yes.

3. The Board invites comments from preparers (including TCWG), users of financial statements (including regulators and investors) and other respondents on the practical aspects of the proposals, particularly their impact on the relationships between:
 - a) Auditors and audited entities;
 - b) Other Pas in public practice and their clients; and
 - c) PAIBs and their employing organizations.

Specific Matters

4. Do respondents agree with the proposed objectives for all categories of PAs?
No, I think it should be added an additional category for Professional Accountants in teaching.
5. Do respondents agree with the scope of laws and regulations covered by the proposed Sections 225 and 360?

Yes, If provided it is believed or authority is designated, such as the Association of Professional Accountants or the equivalent in each country, with sufficient authority to protect the professional accountant of reprisals that they can exercise against people involved in the non-compliance with the relevant laws or regulations. It is also suggested campaigns promoting compliance with laws and other regulations, both counters as people engaged in business and management thereof, according to the culture of each country.

6. Do respondents agree with the differential approach among the four categories of Pas regarding responding to identified or suspected NOCLAR?
No, should be added the PA approach in teaching.
7. With respect to auditors and senior PAIBs:
 - a) Do respondents agree with the factors to consider in determining the need for, and the nature and extent of, further action, including the threshold of credible evidence of substantial harm as one of those factors?
Yes I do.,
 - b) Do respondents agree with the imposition of the third party test relative to the determination of the need for, and nature and extent of, further action?
Yes I do.
 - c) Do respondents agree with the examples of possible courses of further action? Are there other possible courses of further action respondents believe should be specified?
Yes I do.
 - d) Do respondents support the list of factors to consider in determining whether to disclose the matter to an appropriate authority?
Yes I do
8. For PAs in public practice providing services other than audits, do respondents agree with the proposed level of obligation with respect to communicating the matter to a network firm where the client is also an audit client of the network firm?
Yes.
9. Do respondents agree with the approach to documentation whit respect to the four categories of Pas?
Yes I do.