

From: Daniel Friscia <danny.friscia@gmail.com>
Sent: Monday, November 6, 2023 8:40 PM
To: Comments
Subject: [EXT]: Comment - AS 1105.22

Hello –

As it relates to AS 1105, section .22, I have a comment, broken down into parts, surrounding what is currently written. To summarize:

- I believe this section should be bifurcated between substantive tests of details procedures (i.e., procedures performed by the auditor) and controls testing procedures
- The population to which the auditor uses to test a control for operating effectiveness should be established by management and not by the auditor
 - To expand on this, controls are designed, implemented and maintained by management. (AS 5 emphasizes that management is responsible for establishing and maintaining effective internal controls over financial reporting) By that logic, the population of instances to which a control is performed should fall under management to maintain; to which management would be responsible for furnishing for operating effectiveness testing.
 - The current wording of section .22 indicates how the auditor is responsible for that population. While it makes sense that the auditor would be responsible in cases of a substantive test, since these tests are not part of managements framework to perform, controls follow a different logic.

Please let me know if my comment requires any further specificity.

--

Daniel Friscia

The Pennsylvania State University, Class of 2015
Smeal College of Business
B.S. Accounting - Minor: IB & LEBUS

Phi Gamma Nu: Professional Business Fraternity
Phi is for Loyalty

Cell: (973) 796-6174
E-mail: danny.friscia@gmail.com