

December 1, 2003

Office of the Secretary
Public Company Accounting Oversight Board
1666 K Street N.W.
Washington, D.C. 20006-2803

RE: Rulemaking Docket Matter No. 010 (PCAOB Release No. 2003-021)

Proposed Auditing Standard – References in Auditors' Reports to the Standards of the Public Accounting Oversight Board

Dear Sirs:

The Audit and Assurance Services Committee of the Illinois CPA Society is a voluntary group of CPAs from public practice, industry, education, and government. We welcome the opportunity to comment on the proposed auditing standards being considered by the PCAOB. Our comments represent the collective views of Committee members and not the individual views of the members or the organizations with which they are affiliated. The organization and operating procedures of our Committee are outlined in Appendix A to this letter.

We reviewed the proposed standard referred to above and had one consideration. Our Committee believes the auditors' report should continue to refer to "generally accepted auditing standards". This phrase is widely recognized by financial statement users as the appropriate compendium of auditing rules to be applied, and should be used and modified by identifying the relevant promulgating body..

Audit reports should state that the audits were performed in accordance with "generally accepted auditing standards for public companies as established by the Public Company Accounting Oversight Board" or "public company auditing standards generally accepted in the United States of America as established by the Public Company Accounting Oversight Board".

The members of the Audit and Assurance Services Committee of the Illinois CPA Society thank you for the opportunity to respond to this proposal.

Sincerely,

William P. Graf, Chair

Audit & Assurance Services Committee

Scott P. Bailey, Chair

Comment Letter Subcommittee

ILLINOIS CPA SOCIETY AUDIT AND ASSSURANCE SERVICES COMMITTEE ORGANIZATION AND OPERATING PROCEDURES 2003 - 2004

The Audit and Assurance Services Committee of the Illinois CPA Society (Committee) is composed of the following technically qualified, experienced members appointed from industry, education and public accounting. These members have Committee service ranging from newly appointed to more than 20 years. The Committee is an appointed senior technical committee of the Society and has been delegated the authority to issue written positions representing the Society on matters regarding the setting of auditing standards. The Committee's comments reflect solely the views of the Committee, and do not purport to represent the views of their business affiliations.

The Committee usually operates by assigning Subcommittees of its members to study and discuss fully exposure documents proposing additions to or revisions of auditing and attest standards. The Subcommittee ordinarily develops a proposed response that is considered, discussed and voted on by the full Committee. Support by the full Committee then results in the issuance of a formal response, which at times includes a minority viewpoint. Current members of the Committee and their business affiliations are as follows:

Public Accounting Firms:

Large:

Dolinar, James A. CPA Gabouer, Kurt CPA Graf, William P. CPA Graham, G. W., CPA McClanahan, James P. CPA Pierce, Michael J. CPA

Waggoner, Joan, CPA

Medium: (more than 40 employees) Gregor, Sharon J. CPA

Mills, Gary W., CPA Panfil, Stephen R. CPA

Small: (less than 40 employees)

Davila, Antonio Jr. CPA Goltz, Jeffrey M. CPA Kramer, Loren B. CPA Krueger, Andrea L., CPA Lewis, Ludella, CPA Malito, JoAnne M., CPA Owens, Robert W. CPA Spiegel, Richard D., CPA

Industry:

Hunt, Brian J. CPA, JD

Government:

Bailey, Scott P. CPA

Educators:

Petravick, Simon P. CPA Whittington, Oliver R., CPA

Staff Representative:

C. Patricia Mellican, CPA

Crowe Chizek & Co. LLP

KPMG LLP

Deloitt & Touche LLP Grant Thornton LLP

Altschuler, Melvoin & Glasser LLP

American Express Tax & Business Services

Blackman Kallick Bartelstein LLP

Selden, Fox and Associates, Ltd. KGN Financial Group LLC Bansley & Kiener LLP

Hill, Taylor LLC

Rosen, Goltz & Associates Kramer Consulting Services, Inc. Corbett, Duncan & Hubly P.C. Ludella Lewis & Company McGreal, Johnson and McGrane Wermer, Rogers, Doran & Ruzon

Steinberg Advisors, Ltd.

Williams Montgomery & John, Ltd.

Metropolitan Pier & Exposition Authority

Bradley University DePaul University

Illinois CPA Society