



Office of the Secretary
Public Company Accounting Oversight Board
1666 K Street, NW
Washington, DC 20006
USA

11 February 2005

Dear Sirs

PCAOB Rulemaking Docket Matter No. 017
Proposed ethics and independence rules concerning independence, tax services, and contingent fees

ACCA is the largest and fastest-growing international accountancy body. Over 330,000 students and members in 160 countries are served by more than 70 staffed offices and other centres.

ACCA's mission is to work in the public interest to provide quality professional opportunities to people of ability and application, to promote the highest ethical and governance standards and to be a leader in the development of the accountancy profession.

ACCA is an active member of the European Federation of Accountants and, from our worldwide perspective, we fully endorse the comments made to you in that body's letter.

Yours faithfully

A handwritten signature in black ink, appearing to read 'David York', is written over a horizontal line.

David York
Head of Auditing Practice

A handwritten signature in black ink, appearing to read 'Chas Roy-Chowdhury', is written over a horizontal line.

Chas Roy-Chowdhury
Head of Taxation