



Douglas J Flint
Group Finance Director
12 May 2005

Ms Laura Phillips
Office of the Secretary
Public Company Accounting Oversight Board
1666 K Street
NW Washington
DC 20006-2803

Dear Ms Phillips,

PCAOB Rulemaking Docket Matter No. 018

We welcome the opportunity to respond to the Proposed Auditing Standard on Reporting the Elimination of a Material Weakness.

We note that the proposals are in effect a permission to engage audit firms to provide opinions on the correction of a material weakness and are not compulsory. We would be very concerned if there were to be any compulsion to obtain such opinions as we consider that based on Sarbanes-Oxley documentation experience, the work the auditors would deem necessary from their liability perspective would be totally disproportionate to the value to be derived by shareholders from the independent opinion on rectification.

We acknowledge, however, that in certain circumstances where material weaknesses have been identified and disclosed, the measures outlined in the proposed standard may be helpful in providing an increase in investor confidence resulting from the additional audit assurance provided, and therefore we support this proposal.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Douglas J Flint", with a long, sweeping underline.

HSBC Holdings plc
Level 41, 8 Canada Square, London E14 5HQ
Tel: 020-7991 2882 Fax: 020-7992 4872
Web: www.hsbc.com

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