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

**RE: PCAOB Rulemaking Docket Matter No. 019
Proposed Rules on Periodic Reporting by Registered Public Accounting Firms**

Dear Mr. Secretary:

McGladrey & Pullen, LLP is pleased to submit written comments on the proposed rules on periodic reporting by registered public accounting firms. McGladrey & Pullen, LLP is a registered public accounting firm serving middle-market issuers.

General Comments

We appreciate the Board's efforts in trying to minimize the disruption that a firm may experience in connection with their registration with the PCAOB. We acknowledge that certain information previously provided in Form 1 is no longer required to be accumulated by the firm and reported in subsequent filings with the Board.

We do however have other comments and observations relating to the cut-off date of the reporting period for Form 2, the reporting of firm revenue information and the catch-up provision for reporting on Form 3 for firms that are already registered.

Form 2- Annual Report Form, General Instruction Number 4

The proposed rule requires that the Form cover a 12 month period from April 1 to March 31. The proposed rule release stated that the purpose of the reporting period "is intended to coincide with the end point of the period for which the Board's inspection staff will generally request substantial information from firms scheduled for inspection in that year." We suggest that the Board consider allowing the firm some flexibility in selecting a cut-off date perhaps within a time range that would be acceptable to the Board.

In making this suggestion, one matter to consider relates to the fiscal year-end of the firm and the ability of the firm to gather more accurate data with respect to fees billed to audit clients and the firm's total revenue. Our firm for instance, has an April 30 year-end and accordingly the cut-off of billings or the estimate of unbilled services would be more accurate at April 30 than at March 31 and easier for us to report. Another matter to consider is that for firms that are subject to annual inspection by the PCAOB, if

the data request has historically coincided with a period other than March 31, would the PCAOB allow the cut-off for those firms to be something other than March 31 for purposes of reporting on Form 2?

Form 2, Part III, Item 3.2 The Firm's Revenues

This item would require the firm to report as a percentage of the total fees billed to all clients for services that were rendered in the reporting period, those fees attributable to fees billed to issuer clients for services rendered during the reporting period. These percentages are to be broken down by audit services, other accounting services, tax services and non-audit services as defined. The purpose of this disclosure is to "provide a picture of how the firm's services for issuer audit clients compare generally with the firm's services for other clients." Given that amounts are generally billed after the period in which they are rendered or that amounts may be billed that cover a period both before and after the reporting cut-off period, we suggest that the Board consider whether these percentages could also be estimated based upon a firm's internal reporting system that would reflect fees on an accrual basis versus when they might have actually been billed.

Rule 2203, Special Reports

Paragraph (a) (3) stipulates that no later than 14 days after the effective date of the rule, a registered public accounting firm must file a special report to disclose any event specified on Form 3 that occurred after the date used by the firm in their initial registration and before the effective date of the rule. We suggest that this initial catch-up report allow a period longer than 14 days to allow firms to gather whatever information may be required once the final rules become effective. In addition, we question whether certain items need to be disclosed in the catch-up report if they were subsequently resolved. Specifically the disclosure of Items 2.1 and 2.4 dealing with a withdrawn audit report or the unauthorized use of the firm's name that were subsequently resolved would not seem to be important to the investing public and do not require disclosure. In addition if certain legal matters requiring disclosure under Items 2.5, 2.6, 2.7 or 2.8 were subsequently dismissed and disclosed under Item 2.9, we question why such matters should be disclosed at all in the catch-up report.

Closing Comments

We support the Board's initiative to obtain information from registered public accounting firms on an annual basis as well as currently for certain specified events. We appreciate the opportunity to comment on the proposed rules.

Sincerely,

McGladrey & Pullen, LLP