

December 6, 2013

Chairman James Doty
Board Member Lewis Ferguson
Board Member Jeanette Franzel
Board Member Jay Hanson
Board Member Steven Harris
Public Company Accounting Oversight Board
1666 K Street, NW
Washington, DC 20006
SENT VIA EMAIL

Support from Minority Community for PCAOB Proposal to Improve Transparency by Requiring Disclosure of the Engagement Partner

Dear Chairman Doty and Board Members Ferguson, Franzel, Hanson and Harris,

The National Asian American Coalition (NAAC) applauds the Public Company Accounting Oversight Board (PCAOB) for continuing its efforts to improve transparency and responsibility of major corporate audits.

The NAAC has filed comments in many PCAOB proposals over the last three years supporting transparency by auditors and in encouraging decision making by auditing firms that are independent of management.

We support the PCAOB's proposed auditing standards that would require greater transparency of audits of public companies, specifically as it relates to the engagement partner.

We are circulating the PCAOB report to other minority community groups that are affected by and will benefit from more transparency. Some will be filing subsequent comments in support of this proposal.

Specific Benefit to Consumers

Generally, most regulatory proposals for public comment secure abstract responses. In contrast, we offer the following specifics.

Both Edison, whose auditor is PricewaterhouseCoopers, and PG&E, whose auditor is Deloitte & Touche, are requesting billion dollar rate increases that depend largely on independent and accurate Big Four CPA audits.

We have already negotiated with PG&E, as part of their settlement with us in PG&E's General Rate Case (GRC), that PG&E will put out for competitive bid their auditor services. This, at a minimum, will require Deloitte & Touche to compete with other major CPA firms. As part of our regular meetings with the senior management of PG&E, we will discuss with PG&E requiring the winner of its competitive auditing bid to comply with this transparency provision.

Similarly, we are planning to raise, as part of Southern California Edison's GRC, the prospect of putting out a competitive bid for its own auditing functions and that Edison require disclosure of the name of the engagement partner.

Sometime in early 2014, we will be raising similar issues with the CEO of Sempra.

Thus, we will be raising the engagement partner issue with the three largest utilities in California, all of whom regularly request rate increases that in significant part depend on the accuracy of their audits.

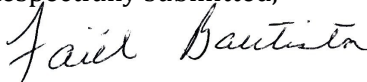
Banking Industry

It is also our intention, over the next few months, since we meet on a regular basis with the Comptroller of the Currency, the Chairman of the Federal Deposit Insurance Corporation, the Chair of the Federal Reserve and senior Treasury officials, to discuss regulatory examinations for the almost 7,000 banks they regulate and ensure compliance with PCAOB transparency standards.

Upon information and belief, 98% of all banks with \$10 billion or more in assets are audited by a Big Four firm, including all financial institutions with \$100 billion or more, such as JPMorgan Chase, Wells Fargo, Citibank, Bank of American, US Bancorp, Capital One and Union Bank.

Similarly, in our meetings with SEC commissioners, we will be raising these issues of disclosure and transparency as they apply to all corporations that must file a 10-K report on an annual basis with the SEC.

Respectfully submitted,



Faith Bautista
President and CEO