HEIN & ASSOCIATES LLP
Certified Public Accountants and Advisors

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September 10, 2009

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

Re: Request for Public Comment: *Concept Release on Requiring the Engagement Partner to Sign the Audit Report* – PCAOB Rulemaking Docket Matter No. 029

Dear Office of the Secretary:

HEIN** & ASSOCIATES LLP* ("HEIN***") is a regional CPA firm with offices in Denver, Houston, Dallas and Southern California. Our Firm has consistently ranked, based on revenues, as one of the 100 largest firms in the United States, and in 2008, we had over $50,000,000 in net revenue. We audit approximately 65 public companies, including many accelerated filers. Revenues from our public company practice represent approximately 35% of our net revenue. As a result of our public company practice, we are a member firm of the Center for Audit Quality ("Center") and serve on its Professional Practice Executive Committee. Practically speaking, we believe we represent a smaller firm performing public company audits and fully appreciate the "barriers" that deter smaller firms from performing audits of public companies.

HEIN expresses our appreciation to the PCAOB and its Board for your effort, time and dedication to improving the auditing standards.

We can understand why, on the surface, some might believe that requiring the individual audit partner to sign the audit report might enhance the audit partner's sense of accountability to users of the financial statements and result in greater exercise of care in performing the audit. However, such a requirement would be contradictory to our audit culture and is based on assumptions that are not true. An audit is performed by more than the individual partner. We believe that focusing on the individual audit partner would be a disservice, because it tries to ascribe more responsibility to the partner in an apparent attempt to increase his or her personal risk, based on the unproven assumption it will increase overall audit quality. Also, a successful audit is based on the quality control, training, experience and expertise of the auditing firm as a whole. The engagement partner is already individually accountable to the PCAOB, SEC, state boards, as well as to the firm and his or her partners, and will generally be named in litigation. Having the partner sign his or her name does not add any real individual accountability and would most likely result in unintended consequences. These include having to deal with inquiries from stakeholders that are more appropriately addressed to management, which could lead to an even greater "expectation gap" as to the auditor's role.

717 17th Street, 16th Floor
Denver, Colorado 80202
Phone: 303-298-9600
Fax: 303-298-8118
www.heincpa.com

We also believe disgruntled shareholders may call and even possibly come to the audit partner's home. Audit partners would undoubtedly delist their phone numbers and avoid any other publication of their personal information. This would create an undue burden on their families, which is simply not fair. Furthermore, we believe many qualified audit professionals will choose not to be partners that sign audit reports, so we may face the very real possibility of a talent drain within the profession. This will ultimately impact the quality of our audits. Finally, we have little doubt that this requirement would further increase the barriers for smaller firms from performing audits of public companies and thereby further reduce future competition in the marketplace.

Thank you for considering our comments on a matter about which we feel very strongly. If you should request any additional information, please do not hesitate to contact Bill Yeates, our National Director of Audit and Accounting.

Hein & Associates LLP

***HEIN** & ASSOCIATES LLP*