

From: [Fagan, Charles \(Fiducial - US - Columbia\)](#)
To: [Comments](#)
Subject: Comments on Docket Matter No. 29
Date: Monday, February 10, 2014 2:29:00 PM

Dean Ms. Rand,

I believe there is sufficient justification for the disclosure of the name of the audit partner/CPA that has ultimate responsibility for the audit. However, I do not believe there is sufficient justification for the disclosure of specific information in regards to other participating independent public accounting firms. The “signing” partner has ultimate responsibility for the quality and performance of the engagement regardless of who performs the various procedures and provides the various documentation. This is in-line with requiring only the CEO and CFO signatures in the quarterly and annual filings. Providing participating firm information in some sense suggests a reduction in responsibility of the primary audit partner. The primary audit firm/partner should have sufficient oversight of the engagement and controls in place to make sure they are in a position to attest to the accuracy and conformity of the financial statements before issuing an opinion.

Charles T. Fagan, CPA, MBA, CGMA, CFE
Columbia, MD