

From: [buhlarry](#)
To: [Comments](#)
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Subject: Docket 029: Improving Transparency Through Disclosure of Engagement Partner and Certain Other Participants in Audits
Date: Tuesday, September 01, 2015 9:26:03 AM

I realize I am one day late on my comments below. The comments are few, and are supplemental to a letter I submitted over 1 year ago.

In my view, identifying the engagement partner will not provide meaningful additional information to investors. Observations in the PCAOB proposal are that identifying the specific senior audit partner will affect some educated investor's investment decision on a registered company or affect the care of the CPA partner signing the report.

The current proposal in how to do it is much better than prior suggestions. However.....

If it takes 15 pages for the PCAOB to summarize some quality evaluative issues for Audit Committees in its "Audit Committee Dialogue" of May 2015, what significant investment or voting decisions are the investing public to make from the disclosure of one partner's name, a partner who may no longer be on the engagement due to rotation or other internal Firm changes? The disclosure is after the financials are filed, and the market has already reacted to the earnings and other information that more likely affects investing decisions. Apparently no one can evaluate audit firms on this factor, if the PCAOB thinks the Audit Committee itself must do many many more steps to fulfill its role in oversight. Thus the exercise of naming a partner seems a personal PCAOB issue not a practical one for the investing or audit world, and should be given up as an issue by the PCAOB. Let the Audit Committees do their job with the much greater information they are provided.

For the PCAOB to continue its path that the name disclosure will cause some enhanced accountability or care-inducing psychological effects on the part of the signing CPA is extending the scope of the PCAOB into the mindset of individuals, which seems beyond the capabilities of your staff or commenters.

Respectfully,

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