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February 8, 2011

Office of the Secretary
PCAOB
1666 K Street, N.W.
Washington D.C. 20006-2803

Re: Comments Regarding PCAOB Rulemaking Docket Matter No. 33
Proposal for Allocation of the Board's Accounting Support Fee Among Issuers,
Brokers, and Dealers, and Other Amendments to the Board's Funding Rules

Board Members:

The Accounting Principles and Auditing Standards Committee (the AP&AS "Committee") of the California Society of Certified Public Accountants ("CalCPA") is pleased to provide our comments to the PCAOB on the proposal to modify the current support fee allocation process to incorporate brokers and dealers.

The AP&AS Committee is the senior technical committee of CalCPA. CalCPA has approximately 35,000 members. The Committee is composed of 50 members, of whom 67 percent are from local or regional firms, 23 percent are sole practitioners in public practice, 5 percent are in industry and 5 percent are in academia. Several of our member's firms audit brokers and dealers.

The Committee supports the proposal as it represents a fair and reasonable methodology to allocate the additional support fees required to enable the Board to conduct its interim program of inspection of brokers and dealers as set forth in the Dodd-Frank Wall Street Reform and Consumer Protection Act. The Committee also supports the Board's proposals to (1) amend the basis for calculating an issuer's market capitalization to include the market capitalization of all classes of the issuer's voting and non-voting common equity, and (2) increase the average monthly market capitalization thresholds in the funding rules for classes of equity issuers and investment companies.

We thank the Board for the opportunity to comment on the proposed standard. We would be glad to discuss our opinions with the Board should they have any questions or require any additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read "JoAnn Guattery".

JoAnn Guattery, Chair
Accounting Principles and Auditing Standards Committee
California Society of Certified Public Accountants