

**From:** [John L. Pierschbacher](#)  
**To:** [Comments](#)  
**Subject:** Proposed auditor reporting standard  
**Date:** Thursday, November 14, 2013 3:45:51 PM

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November 8, 2013

Public Company Accounting Oversight Board

Re: Proposed Amendments to PCAOB Standards Related to the Proposed Auditor Reporting Standard

Members of the Board:

I appreciate the opportunity to comment on *The Auditor's Report on an Audit of Financial Statements When the Auditor Expresses an Unqualified Opinion*. I am an investor in various stocks and have worked in public accounting. As an investor, I would like to provide my opinion on some of your proposed changes.

**Critical Accounting Matters:**

I am concerned that the proposed prominence given to the critical accounting matters will add confusion to the readers of the financial statements and distract from the primary purpose of the auditor's report. The auditor's opinion on the fair presentation of the financial statement should receive prominence and not be diluted.

**Independence:**

Including a statement as to the auditor's independence does not provide any meaningful information. If an auditor is unethical enough to give an opinion on an audit and that auditor is not independent, why would that same auditor have any qualms about stating they were independent as a part of their report.

**Auditor's Years of Service:**

I would not clutter up the auditor's report with information such as the years of service of an auditor. Such information could easily be included in the proxy statement of a public company, although there is no evidence that multiple years of service has any negative effects on the quality of the audit performed.

The PCAOB needs to focus on how to make opinions meaningful in instances like jurisdictions that do not allow inspections by the PCAOB and audits of certain industries that have typically had a lack audits of quality audits.

I appreciate the opportunity to share my viewpoint on the Proposed Standards.

Sincerely

**John Pierschbacher, Investor**

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