PPG Industries, Inc.
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William H. Hernandez
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February 26, 2007

Ms. Nancy M. Morris, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609

Re: File Number S7-24-06
and PCAOB Rulemaking Docket No. 021

Dear Ms. Morris:

PPG Industries, Inc. (PPG) is pleased to submit comments regarding the Security and Exchange Commission (SEC) proposed interpretive guidance related to Section 404 of the Sarbanes-Oxley Act of 2002 and the proposed amendments to Rules 13(a)-15 and 15(d)-15 of the Securities Exchange Act of 1934 and Rile 2-02(f) of Regulation S-X. We have also incorporated comments related to the Public Company Accounting Oversight Board (PCAOB) newly proposed Auditing Standard, Rulemaking Docket No. 021. PPG Industries is a leading diversified manufacturer that supplies coatings, glass and chemical products and services around the world. The company employs approximately 32,000 employees and operates over 100 manufacturing locations worldwide.

PPG continues to support the SEC and the Public Company Accounting Oversight Board (PCAOB) in its efforts to strengthen the integrity of financial statements. PPG is a company with a long-standing history of commitment to strong internal controls. We have been diligent in balancing the cost of controlling and mitigating the risks we face with the benefits derived from those efforts, ensuring that PPG most appropriately manages the use of our shareholders' investments. These new proposals will enable management to increase the benefits of compliance and conduct a more effective and efficient evaluation of internal control over financial reporting.

PPG, like many other companies registered with the SEC, competes in a world market. Performing unnecessary and, in many cases, duplicative compliance activities that do not address the "true risks" we face will lead to costs that outweigh the benefits intended with compliance. These new proposals will allow corporations to increase their focus on shareholder interests and improve U.S. global competitiveness.

For your consideration, PPG respectfully offers the following comments strongly supporting the new guidance and audit standard.

Alignment of Management and Auditor Evaluation Approach

PPG is a focused and results directed company that understands our responsibility for providing reliable financial information to the investment community. As a result of this, PPG, not unlike other SEC registrants, has adopted the top-down risk based approach in evaluating our internal control over financial reporting. Also, in line with the spirit of "monitoring" put forth in the COSO framework, we believe evaluating the effectiveness of internal controls should focus on testing of the company-wide and higher level controls. The new SEC guidance and the PCAOB standard allows for increased focus on the high risk areas and higher level controls eliminating unnecessary testing of lower risk controls conducted only to satisfy an arbitrary coverage requirement. This would eliminate the excessive time and effort of both management and external auditors on testing controls related to routine procedures and place emphasis on the strength of the overall control environment.

The new auditing standard will require the auditors to use the same top-down risk based approach as management increasing the focus on the most important controls and not “large portion” coverage. The auditor focus will be more appropriately aligned with the objective of preventing and detecting fraud. It will also provide management with easier implementation of enhancements to the compliance effort through the use of continuous monitoring, reliance on prior year work, and self assessments. All of which will more align cost with the benefits derived, yet also maintain the focus on a strong control environment.

<u>External auditor assessment of management’s evaluation process</u>

The requirement for the external auditors to opine on the effectiveness of the internal control structure, as well as opining on management’s assessment of the effectiveness of the internal control structure, results in significant amounts of redundant and non-value added effort on the part of both the external auditors and management. The elimination of an attestation by the external auditors of management’s assessment would greatly reduce this wasted effort.

<u>Elimination of unnecessary auditing</u>

The new standard provides auditors with the means to expend appropriate focus on those controls important to the prevention and detection of fraud and to eliminate procedures that are not necessary to achieve the intended benefits. The new standard allows for more efficient audits by permitting consideration of prior year work, multi-location testing requirements based on risk not coverage and removing the barriers to using the work of others.

<u>PCAOB Inspection Process</u>

PPG wholeheartedly supports the new auditing standard proposed by the PCAOB; however, the implementation of the standard is what matters most. The Board has indicated that it would use the inspection program to ensure firms are conducting their audits in the most efficient manner as would be required by the new standard. The inspection program should be a powerful monitoring tool over how auditing is performed both from a risk perspective and an elimination of unnecessary auditing. It is critical to meeting this objective of conducting audits as efficiently as possible, that the Board sets a strong tone that firms are required to follow the standard. The inspections program should be enhanced to increase the timeliness of the inspections and availability of the information obtained in that process.

Thank you for the opportunity to comment on the recent proposals related to Sarbanes-Oxley Act. If you have any questions or require additional information, please contact John M. Stephenson, General Auditor at (412) 434-3890.

Sincerely yours,

William H. Hernandez es

cc: J. M. Stephenson