

From: Paul F Schneider <parkfor@bluefrog.com>
Sent: Monday, February 13, 2023 11:16 AM
To: Comments
Subject: [EXT]: PCAOB Rulemaking Docket Matter No. 028

I noticed the recent request for comment on the new proposed PCAOB standard : “The Auditor’s Use of Confirmation, and Other Proposed Amendments to PCAOB Standards.”

Given that this significantly changes the position “Consideration of the Internal Audit Function.” stated in Accounting Standard 2605 (AS 2605). I have some concerns.

Note that I have been both an External and Internal Auditor and am well aware of independence requirements, responsibilities and standards.

My concerns are:

- What evidence is there that the External / Internal Audit relationship being revised is failing and does not demonstrate independence?
- Absent proof, what impetus caused this decision?

Action without ***demonstrated or documented*** reasons is foolhardy and could have very negative impacts in the future on the professions and the stakeholders it serves.

Respectfully,

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