

**MEMO# 22848**

September 4, 2008

## **Conference Call Scheduled Thursday, September 18 at 3:30 PM To Elicit Feedback On A New Auditor Compliance Attestation**

[22848]

September 4, 2008

TO: CHIEF COMPLIANCE OFFICER COMMITTEE No. 11-08    RE: CONFERENCE CALL  
SCHEDULED THURSDAY, SEPTEMBER 18 AT 3:30 PM TO ELICIT FEEDBACK ON A NEW  
AUDITOR COMPLIANCE ATTESTATION

Representatives from the Institute's Operations Committee, together with the "big four" accounting firms, have been working on a project, headed up by Tom Hamblin of Capital Research, to develop an auditor attest engagement relating to the oversight of intermediaries that distribute fund shares. The purpose of this engagement is to provide fund sponsors with assurance that the selling intermediary is complying with its obligations under the funds' prospectuses and selling agreements. The attest engagement would be performed under recently adopted AICPA SOP 07-2, Attestation Engagements That Address Specified Compliance Control Objectives and Related Controls at Entities That Provide Services to Investment Companies, Investment Advisers, or Other Service Providers. It is expected that the auditor would provide the opinion from the engagement to the selling intermediary, who could then share it with fund organizations to assist them in fulfilling their oversight obligations under the mutual fund compliance program rule, Rule 38a-1.

Obviously, the success of this new engagement will largely depend upon its value to mutual fund chief compliance officers. Because of this, the Operations Committee has requested that the ICI's CCO Committee review the proposed engagement and provide feedback on it. A conference call of the CCO Committee has been scheduled for this purpose on

Thursday, September 18 from 3:30-4:45 (Eastern). To obtain the call-in information and passcode, please contact Lynnette Smith of the ICI by email ([lsmith@ici.org](mailto:lsmith@ici.org)) or by phone (202-326-5818).

During the call, Mr. Hamblin, Nick D'Angelo of PriceWaterhouseCoopers, and Greg Smith of the ICI's Operations Department will lead the discussion on the engagement and respond to any questions from members of the Committee. To better acquaint you with the engagement prior to the call, attached please find:

- A powerpoint slide show that provides an overview of the engagement;
- A "Financial Intermediary Controls and Compliance Assessment" matrix that details the activities performed by the intermediary that may be covered by the engagement; and
- A draft form of an auditor's opinion that might be issued pursuant to such an engagement.

Persons unable to participate in the call who have comments or questions about this project should direct them to Greg Smith by email ([smith@ici.org](mailto:smith@ici.org)) or by phone (202-326-5851).

Tamara K. Salmon  
Senior Associate Counsel

[Attachment](#)

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