MEMO# 14649

April 18, 2002

ICI COMMENT LETTER ON PROPOSED RESTRUCTURING OF THE FASB

[14649] April 18, 2002 TO: ACCOUNTING/TREASURERS COMMITTEE No. 17-02 SEC RULES COMMITTEE No. 32-02 RE: ICI COMMENT LETTER ON PROPOSED RESTRUCTURING OF THE FASB The Institute recently filed a comment letter on the proposed restructuring of the Financial Accounting Standards Board. The proposed restructuring is intended to allow the FASB to be more flexible in responding to change and to improve the efficiency of the accounting standard setting process. The letter is attached and summarized below. The proposed restructuring would reduce the size of the FASB from seven to five members, eliminate the super-majority voting requirement for approval of new standards, and reduce the length of public comment periods on proposed standards. The Institute's comment letter notes that one of the seven Board seats has traditionally been reserved for a representative of the investor community. The Institute's letter suggests that one or more Board seats be reserved for representatives of the investor community, even if the Board is decreased from seven to five members. The Institute's letter notes that investors are the ultimate consumers of financial information produced by issuers of securities, and that the Board should be structured to ensure that their views are afforded due consideration in the standard setting process. Gregory M. Smith Director - Operations/ Compliance & Fund Accounting Attachment Attachment (in .pdf format)

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