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July 29, 2011

Ms. Elizabeth M. Murphy, Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

File Reference No.: 4-600, *Commission Statement in Support of Convergence and Global Accounting Standards*

Dear Ms. Murphy:

McGladrey & Pullen is pleased to submit comments on the Staff Paper entitled, "Work Plan for the Consideration of Incorporating International Financial Reporting Standards into the Financial Reporting System for U.S. Issuers" (the "Staff Paper"). We appreciate the opportunity to comment on this proposal, and we support the U.S. Securities and Exchange Commission (SEC) in its commitment to the use of high-quality financial accounting standards and ensuring comparability of financial information.

In general, we believe investors would benefit if issuers used a single set of high-quality, globally accepted accounting standards in preparing their financial statements. While we have some concerns related to the approach presented in the Staff Paper, it is our opinion that the approach represents the most practical approach presented to date for incorporating IFRS into the U.S. financial reporting system. We believe the approach would result in a single set of high-quality accounting standards while minimizing costs and effort required to incorporate IFRS into the U.S. financial reporting system for U.S. issuers.

We are supportive of the aspects in the approach that would result in the retention of sovereignty on the part of the SEC and FASB. We believe that the role described for the FASB would cast it in a role similar to that of other national standard setters, and we believe it is imperative that the SEC retain its authority to prescribe accounting standards applicable to U.S. issuers.

Having said that, however, we believe that certain aspects of the Staff Paper give cause for concern. For example, the strategy for transition for Category 3 IFRSs calls for prospective application whenever possible. While we believe that prospective application would reduce costs of adoption, and generally support it for that reason, we note that it is not without drawbacks. For example, it is inconsistent (for the most part) with the requirements of IFRS 1, which calls for retrospective application (with certain exceptions). Additionally, the use of prospective application, especially over an extended transition period such as this, may hinder financial statement analysis. This is one reason that the transition plan will have to be well planned and well communicated.

We acknowledge there is no single approach to incorporating IFRS into the U.S. financial reporting system that would be problem-free. However, as stated previously, we believe that the approach presented in the Staff Paper represents an approach that merits further consideration, as the positives appear to outweigh the negatives.

We would be pleased to respond to any questions you may have concerning our comments. Please direct any questions to Rick Day (563-888-4017) or Richard Stuart (203-905-5027).

Sincerely,

McGladrey & Pullen, LLP

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