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U. S. Securities and Exchange Commission
100 F Street, NE, Washington, DC 20549. <http://www.sec.gov/rules/other.shtml>

Release No. 34-65602; File No. 4-640: Inaugural Roundtable of the Financial Reporting Series Entitled "Uncertainty in Financial Statements: How Much to Recognize and How Best to Communicate It"

Dear U.S. Securities and Exchange Commission:

Thank you for the opportunity to listen and comment on the inaugural roundtable on uncertainty.

1. Please provide feedback on any topics where the extent of uncertainty in an accounting measurement is less useful to investors and why a more certain measurement would be preferable.

Panelists called for reliable Statements of Cash Flows. Cash is critical for continuity of operations.

Every source and use of cash should be traceable and reportable through the accounting system.

Fair value accounting should be systematically excluded from the Statements of Cash Flows.

The direct-direct method is described in the Project on Financial Statement Presentation, Topic of Statement of Cash Flows, Joint International Group, Financial Institution Advisory Group, Agenda Reference 5, Staff Paper dated July 27, 2009.

Gross cash flows by type should be reported in redesigned Statements of Cash Flows.

8. Please provide feedback on whether (and how) a change in the auditor's responsibility or role would enhance the investor's understanding of the nature and extent of measurement uncertainties.

The panel discussions implied to me that the auditor's unqualified opinion does not communicate measurement uncertainty. An unqualified opinion states in part as follows:

In our opinion, the financial statements ... present fairly, in all material respects, the financial position ... and the changes in its financial position and its cash flows [Underline added.]

Present fairly includes fair value.

Fair value depends upon models, expectations, assumptions, analysis, estimates and judgments.

That fair value is presented fairly means what?

One of your panelists expected more paragraphs on uncertainty in auditors' opinions. Another panelist said to stop the "speculative estimates" and return to certainty in financial reporting.

Sincerely,

Caroline Walker