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April 10, 2019

Mr. Brent Fields
Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

Re: File Reference No. PCAOB 2019-02

SEC Release No. 34-85434, Notice of Filing of Proposed Rules on Auditing Accounting Estimates, Including Fair Value Measurements, and Amendments to PCAOB Auditing Standards

Dear Mr. Fields:

Deloitte & Touche LLP ("we" or "our") is pleased to respond to the request for public comment from the Securities and Exchange Commission (the "SEC" or "Commission") on SEC Release No. 34-85434, *Notice of Filing of Proposed Rules on Auditing Accounting Estimates, Including Fair Value Measurements, and Amendments to PCAOB Auditing Standards* (collectively referred to as the "proposed standard and amendments").

We support the objectives of the proposed standard and amendments including alignment of the applicable requirements with the PCAOB's risk assessment standards and additional focus addressing potential management bias in accounting estimates, as part of applying professional skepticism. As explained in the PCAOB release that accompanies the proposed standard and amendments, accounting estimates is an area of the audit that is of increasing significance and the proposed standard and amendments will strengthen audit requirements and compel a more uniform, risk-based approach in this area. The proposed standard and amendments achieve this through focusing auditors on estimates with greater risk of material misstatement. We believe that concurrently adopting amendments to the PCAOB standards for using the work of specialists, which are often involved in developing or evaluating accounting estimates, is thoughtful and appropriate.

We encourage the SEC to support the PCAOB in its plans to (1) monitor implementation of the new requirements, (2) conduct a post implementation review of the requirements, and (3) monitor advances in technology and any effect such advances may have on the application of the proposed standard and amendments.

We appreciate the opportunity to provide our perspectives on the proposed standard and amendments. If you have any questions or would like to discuss our views further, please contact Dave Sullivan at [REDACTED].

Sincerely,

Deloitte & Touche LLP

cc: Jay Clayton, SEC Chairman
Robert Jackson Jr., SEC Commissioner
Hester Peirce, SEC Commissioner
Elad Roisman, SEC Commissioner
Wesley Bricker, SEC Chief Accountant
Marc Panucci, SEC Deputy Chief Accountant
Megan Zietsman, PCAOB Chief Auditor and Director of Professional Standards