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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 2019-03

SEC Release No. 34-85435, Notice of Filing of Proposed Rules on Amendments to Auditing Standards for Auditor's Use of the Work of Specialists

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. 34-85435, *Notice of Filing of Proposed Rules on Amendments to Auditing Standards for Auditor's Use of the Work of Specialists* (collectively referred to as the "proposed amendments").

We support the objectives of the proposed amendments including strengthening the requirements related to evaluating the work of a company's specialist and related to supervising and evaluating the work of both auditor-employed and auditor-engaged specialists. As explained in the PCAOB's release that accompanies the proposed amendments, specialist involvement on audits "continues to increase in both frequency and significance," and accordingly it is important for auditors to appropriately evaluate a company's specialist's work intended to be used as audit evidence and supervise and evaluate the work performed by an auditor's specialist. The proposed amendments address the need to differentiate, define, and provide scalability of the requirements based on the nature of a specialist's involvement in the context of an audit as well as the identified risk of material misstatement to which the specialist's work relates. We believe the proposed amendments will achieve greater consistency in practice. Further, we believe that concurrently adopting the PCAOB's proposed standard and amendments for auditing accounting estimates, which often involve using the work of specialists, is appropriate.

We encourage the SEC to support the PCAOB in its plans to (1) monitor implementation of the amended requirements for the auditor's use of the work of specialists, (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 amendments.

We appreciate the opportunity to provide our perspectives on the proposed 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