

February 25, 2007

Ms. Nancy M. Morris, Secretary
Security and Exchange Commission
100F Street NE
Washington DC 20549-1090

RE: File No. S7-24-06

Dear Ms. Morris,

I am a student at the University of Wisconsin-La Crosse majoring in accountancy. In conjunction with an Information-Systems course, we've spent many class hours paging through the proposed interpretative guidance for management. I applaud the effort of the SEC to reduce cost and impractical standards, but more importantly always keep the investor's wellbeing in mind. Many companies and professionals criticize the financial burdens placed on their businesses, claiming them to be unnecessary. I, however, understand the recent scandals have made financial reporting standards more crucial than ever.

One aspect of the guidelines I feel are worth addressing is in regards to internal controls in small companies. Most companies I would consider to be a decent size would be recognized as small by the SEC. By decent, I presume these companies have a reasonable amount of investors and employees. It is not a ludicrous request that companies be sufficiently knowledgeable about their own businesses' internal controls. I, in fact, find it hard to believe that management's daily interactions would satisfy this need for knowledge. All investors need protection from fraudulent actions and often small, unsuspecting investors put their money into small, local companies they feel connected with. I understand that cost effectiveness is very important and small companies have less cash to spend. However, a need-based internal controls evaluation rather than a single methodology is no assurance of reliable financial reporting but can only make it more likely.

Eliminating vague guidelines will provide a sense of stability and control for both investors and businesses.

Administering an amendment with more specific formalities would be a great help in improving effectiveness.

Overall, I find it very necessary to eliminate large financial burdens while continuing to always remain focused on the small investor's behalf.

The definition of a small company should be taken into serious consideration when determining what standards they can afford to follow.

In a world with more fraudulent behavior, it's important to be more safe than sorry.

Yours sincerely,

Jackie Stoikes
2009 candidate for the CPA Exam
University of Wisconsin- La Crosse