

April 15, 2009

**Florence E. Harmon**  
**Acting Secretary**  
**Secretary, Securities and Exchange Commission**  
**100 F Street, NE**  
**Washington, DC 20549-1090**

**Re: File No. S7-27-08**

To Whom It May Concern:

Accretive Solutions is a leading privately-held professional services firm that specializes in consulting and executive search solutions in the areas of accounting and finance, enterprise governance and business and technology. We provide services to our clients through a network of offices located in 12 major metropolitan markets. Our clients include those in the Fortune 500 as well as smaller, non-accelerated filers and span a broad variety of industries.

Throughout our 30-year history, we have provided consulting services to hundreds of companies that are public filers with the Securities and Exchange Commission ("SEC"). Working collaboratively with client management and our clients' external auditors, we have gained a unique perspective of the typical issues faced by SEC registrants – from both the client and external audit firm vantage points.

Accretive Solutions has a significant and continued interest in the rulemaking activities of the SEC and we welcome the opportunity to provide our comments to the SEC related to File No. S7-27-08 "Roadmap for the Potential Use of Financial Statements Prepared in Accordance with International Financial Reporting Standards" (hereafter referred to as "the IFRS Roadmap").

***The Benefits of a Single Set of Globally Accepted Accounting Standards and the Potential Use of IFRS in the U.S.***

We believe that U.S. investors, issuers and markets would benefit from the use of a single set of globally accepted accounting standards. Increasingly, businesses define their markets using global boundaries rather than regional territories. Similarly, investors have expanded their horizon far beyond domestic borders as advances in technology bring improvements in the availability of

timely and reliable information from companies around the world. The use of multiple, country-specific accounting standards no longer makes sense in a world “growing smaller” each day, as investors, businesses and markets evaluate decisions in global terms.

In November 2008, the Leaders of the Group of Twenty convened in Washington D.C. to discuss the global economy and measures necessary to restore growth and achieve reforms in the world’s financial systems. One of the actions agreed upon by this group was the recommendation that global accounting standard setting bodies work toward the creation of a single, high-quality set of accounting standards. In our opinion, IFRS is the only set of standards that can achieve this goal. While the arguments over which standards (U.S. GAAP or IFRS) produce the highest quality accounting will continue to yield respectful differences of opinion, we believe the question itself to be somewhat moot. The facts are these:

- In the past decade, hundreds of countries have announced plans or completed conversion of their country-specific GAAP to IFRS. It is extremely unlikely that these same countries would choose to adopt U.S. GAAP (and therefore undergo yet another conversion) in order to achieve the goal of a single set of global standards.
- IFRS is a high-quality set of accounting standards. The debate over which standards are of the *highest* quality may continue, but few can effectively argue that IFRS does not meet this criterion and that active projects by the IASB will only continue to improve the effectiveness of IFRS.

In its current state, IFRS remains imperfect and continued improvements are necessary; however, the same is true of U.S. GAAP. While IFRS may be criticized for its lack of specifics and potential for diversity in application, U.S. GAAP is equally criticized for its extreme complexity and focus on specific rules and “bright-line” tests. The question of which set of standards will result in the highest-quality accounting system may never be answered. However, if it is agreed by the major countries of the world (including the U.S.) that the preferred state is a single set of high-quality global accounting standards, for the reasons noted above, we believe IFRS to be the only realistic, practical solution.

### ***Milestones Included in the IFRS Roadmap***

While we appreciate the necessity of continued improvements in the governance, education and application of IFRS, we believe that the milestones included in the IFRS Roadmap will lead to a general postponement of activity by most public companies, until such time as a final rule and definitive deadlines are issued by the SEC.

As we meet with our clients, many of whom are accelerated and large-accelerated filers, all understand the significance of the effort required to implement IFRS within their organizations. Yet despite this, almost none are willing to take meaningful steps towards conversion as long as a possibility remains that the SEC may never approve a final rule. Especially in these difficult economic times, finance organizations have little chance of obtaining the executive level support and funding needed to begin the process of educating their teams, assessing the differences between U.S. GAAP and IFRS and planning for the process and system impacts that will result from a conversion to IFRS.

We agree with the SEC's proposed timing that would require IFRS adoption and issuance of compliant financial statements beginning in 2014. This date should provide ample time for companies to plan, design and implement their strategies for conversion in a manner that will permit the most efficient use of resources. It should also provide sufficient time for increased education of IFRS in the U.S. However, the achievement of an efficient conversion process and improved education of IFRS is predicated on the assumption that companies begin these efforts in the very near future. With the current IFRS Roadmap milestones and delay of a final rule by the SEC until 2011, we believe that the significant majority of U.S. issuers will defer any significant educational and implementation activities until 2011. Accordingly, this shortened timeline will result in increased pressure on all resources (e.g. internal, regulatory and external auditors) and inevitably result in higher costs of conversion.

### ***The Timing and Method of the U.S. Transition to IFRS***

We believe that mandated use of IFRS beginning in 2014 is an appropriate date for the transition, subject to our comments related to issuance of a final rule in 2011 noted above.

We also believe the proposed staged-transition to be the best approach to facilitate the adoption of IFRS by U.S. issuers. The efforts required to implement IFRS will be significant and the burden on company personnel, external auditors and other service providers could be overwhelming if not undertaken with sufficient “runway” for completion. There is (and will likely remain) a limited number of IFRS specialists in the U.S. and it seems very unlikely that there would be sufficient expertise available to facilitate the transition of all U.S. issuers on a single date. As a result of the strain on resources, the quality of financial reporting may suffer during this transition and in particular for smaller companies unable to attract the limited expertise available in the market.

Finally, we believe that the proposed approach to begin the transition with the largest companies and incrementally add smaller companies over a three-year period is appropriate. As previously stated, adoption of IFRS by all affected companies on a single date would be extremely difficult. On the other hand, extending the transition period beyond three years will prolong a challenging time for investors as they attempt to evaluate a capital market that includes companies reporting under two different accounting standards – IFRS and U.S. GAAP. The staged-transition period is necessary to keep the system from being overwhelmed, but should be limited to as brief a period as possible in order to minimize confusion and complications in the market.

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Accretive Solutions sincerely appreciates the opportunity to provide our feedback and comments to the SEC. Please do not hesitate to contact us if you wish to discuss any of our comments in greater detail.

Respectfully Submitted,

Todd Markus  
VP – Accounting & Finance and Enterprise Governance

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