

The Commissioners  
SEC  
100 F. Street, NE  
Washington , DC 20549-1090

Re: File Number S7-27-08 “Roadmap for the Potential Use of Financial Statement’s Prepared in Accordance with international Financial Reporting Standards.”

Dear Commissioners:

I have two comments. First, after reading your Roadmap, and Requests for Comments, I feel that you need a staunch reminder that you are the Securities Exchange Commission. You are no longer a kid named “Earl,” you make the rules. We need an SEC that is taking names and kicking ass. Your proposed rule and schedule has no gusto.

One example is all that is needed to illustrate the Roadmap’s pussyfooting:

On pages 68-75, the proposal outlines two plans that the SEC cannot seem to choose between. Proposal A that will require that IFRS disclosures be reconciled with US GAAP, and proposal B that will require a supplemental GAAP disclosure. To put this in perspective, this is for issuers who may (you are requesting comments) have the option (yes, it is optional) to switch to IFRS early. Yes, that is right, you want comments and are concerned about the feelings of industries that optionally would, unless people get upset about giving companies the option of switching early, be in a situation where they might have to reconcile instead of supplement. The poor things. Seriously, throw your weight around a little!

Second, I would like to comment on one of your overarching principles. The Roadmap touts IFRS as a superior accounting system because it has less guidance, and thus allows increased “flexibility.” The Roadmap suggests that this is desirable because it will allow corporations to account for transactions in ways that reflect reality rather than unnecessary restrictions. However, historically corporations have not used such freedom to reflect reality, they have used it to defraud investors, the SEC, and the public. The Roadmap says that IFRS is a principles based system, but these CFO’s have no principles. This is not a positive element of the system; it is a problem that must be addressed.

Sincerely,

Nathan Brown