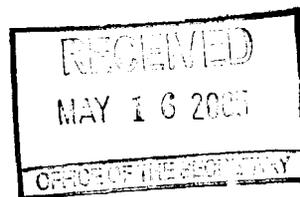




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NICK S. CYPRUS
*Senior Vice President,
Controller and
Chief Accounting Officer*

May 9, 2005

Mr. Jonathan G. Katz
Secretary
Securities and Exchange Commission
450 Fifth Street NW
Washington, DC 20549-0609

Re: File No. 4-497

Dear Mr. Katz:

This letter is submitted in response to the Commission's request for written feedback from registrants and others on the implementation of the new reporting requirements adopted pursuant to Section 404 of the Sarbanes-Oxley Act of 2002.

Background

The Interpublic Group of Companies, Inc. and subsidiaries (the "Company") is one of the world's largest marketing services companies, comprised of hundreds of communication agencies around the world that deliver custom marketing solutions on behalf of our clients. Our agencies cover the spectrum of marketing disciplines and specialties, from traditional services such as direct marketing and advertising to innovative services such as experiential marketing and branded entertainment.

We request that the Commission consider continuing the postponement of the acceleration of periodic report filing dates from 75 to 60 days for Annual Reports on Form 10-K, and from 40 to 35 days for Quarterly Reports on Form 10-Q for reports filed by "accelerated filers" (as defined in Rule 12b-2 under the Securities Exchange Act of 1934 [the "Exchange Act"]). Under the Commission's final rule set forth in its Release No. 33-8507 (the "Release"), the final phase-in period for acceleration will be effective for all reports filed by affected reporting companies for all periods starting with the filer's fiscal year ending on or after December 15, 2005. We support the Commission's efforts to provide investors with access to timely financial reporting of the utmost reliability and transparency, but we have concerns that the commitment to providing such accurate and reliable financial reporting, given the continuing time and effort required to comply effectively with the requirements relating to internal control over financial reporting under Section 404 of the Sarbanes-Oxley Act of 2002, may be negatively impacted by the acceleration of filing dates at this time.

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Internal Control Remediation Efforts

Given the recent disclosures made by many public companies, including our Company, identifying material weaknesses in internal control over financial reporting, we believe that the continued postponement of the accelerated filing dates would be beneficial in assisting such companies during the resultant period of internal control remediation, as well as allowing the time necessary to comply with Section 404 in future periods, while remaining in good standing with the Commission's timely filing requirements. We note that many public companies, in connection with their most recently filed Annual Reports on Form 10-K, took advantage of the 15-day extension provided by Rule 12b-25 under the Exchange Act to maintain their timely filer status. We believe the Commission should consider whether the consequences of being a delinquent filer, including as a result of Section 404 non-compliance, such as the loss of short-form registration eligibility, potential defaults under debt covenants and violation of applicable listing rules, and the associated negative perception of the delinquent company on the part of investors, the banking community, rating agencies, clients, employees and other constituents, may ultimately foster an unjustified perception of increased risk and divert management's attention from the remediation of material internal control weaknesses.

For companies like ours with material weaknesses that require additional closing procedures and personnel hours to assure that our financial statements fairly present in all material respects the financial condition and results of operations of the company, simply meeting the current accelerated deadlines presents significant challenges. We believe by further accelerating the deadline to close the books and report financial results, any benefits of further accelerated reporting would be more than offset by the risks of companies becoming delinquent filers or increasing the chances of a material misstatement occurring in the reported results. Neither of these is an acceptable outcome.

Preparation and Assessment of Financial Reporting and Internal Controls

The Commission stated in the Release that its rationale for postponing the final phase-in of the accelerated filing deadlines was to address concerns that the final step in acceleration of the periodic reports could impede some accelerated filers' initial efforts to implement the internal control requirements carefully and completely. The initial assessment of internal controls proved to be very costly and time-consuming for many companies. While many companies and commentators have expressed that they expect a reduction in the time required to complete future internal control assessments, we believe that the Commission's rationale in the Release continues to be valid and that without continuing relief the proposed acceleration of filing deadlines will continue to present a significant challenge.

As is the case with many global corporations, our financial reporting process is complex. We collect information from hundreds of our agencies around the world, consolidate it centrally and subject it to further analysis. As a result of our internal control assessments,

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we, like many companies, have either added or enhanced numerous controls surrounding the financial reporting process and have increased the level of scrutiny and analysis performed. While these additional controls have greatly improved the quality and accuracy of the financial reporting process, we anticipate that most financial reporting cycles will, for the foreseeable future, continue to require additional time.

Furthermore, in order to address the material weaknesses many companies have identified following their initial internal control assessments, their independent auditors will require additional procedures and time to complete their financial statement and internal control reports. We expect that this additional timing requirement will also be in tension with the accelerated filing deadlines.

We believe that the current 75-day filing deadline for Annual Reports on Form 10-K and 40-day deadline for Quarterly Reports on Form 10-Q provide sufficient but not excessive time for management, audit committees boards of directors and independent auditors to prepare, analyze and review financial information, including any additional work that may be appropriate and necessary in light of identified material control weaknesses.

Conclusion

Given the level of appropriate work required of management, audit committees, directors and independent auditors to prepare and review quality financial reporting, assess internal control over financial reporting and otherwise comply with the requirements of Section 404, as well as to remediate identified material weaknesses in internal control, we believe it is necessary to balance timely with accurate and high quality financial reporting, in order that neither reporting companies nor investors are significantly compromised by filing date deadlines. We believe retaining the additional fifteen days for Annual Reports on Form 10-K and five days for Quarterly Reports on Form 10-Q filings will make a substantial difference in the quality and accuracy of financial reporting by providing all parties sufficient time to prepare and assess financial reporting while still providing the investment community accurate and high quality information on a timely basis.

We feel that the current, already accelerated deadlines provide the investing public with information on a timely basis. We note in this regard that recent changes to the rules governing Current Reports on Form 8-K, including the expanded number of reportable events under those rules and the accelerated related Form 8-K filing dates, provide a means to provide investors with timely information on significant and material events regarding reporting companies.

To address the issues described above, we request that the Commission consider the continued postponement of the final phase-in of its accelerated periodic report filing deadlines.

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We would be pleased to discuss our comments with the Commission or its staff at your convenience.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nick S. Cyprus", with a long horizontal flourish extending to the right.

Nick S. Cyprus
Senior Vice President, Controller and Chief Accounting Officer
The Interpublic Group of Companies, Inc.

cc: Donald T. Nicolaisen, Chief Accountant
Andrew D. Bailey, Jr., Deputy Chief Accountant
Carol A. Stacey, Chief Accountant, Division of Corporation Finance
Alan L. Beller, Director, Division of Corporation Finance