



LEGISLATIVE COUNCILLOR (ACCOUNTANCY) Paul Chan Mo Po FCPA, MH, JP

立法會議員(會計界) 陳茂波 資深會計師

30 March 2009

The Council of
The Hong Kong Institute of Certified Public Accountants
37/F, Wu Chung House
No. 213 Queen's Road East
Wanchai,
Hong Kong

Dear Members of the Council,

The letter from Chief Executive Winnie Cheung, dated 23 March, has been received. I notice from the closing of her letter that the Council has not yet had the opportunity to consider the issues I raised. I therefore shall not assume that Ms Cheung's letter represents the Council's view and position. I shall keep faith that the Council will, in spite of and unfettered by the 23 March letter, thoroughly deliberate on the issues and direct the way forward.

Some assertions in Ms Cheung's letter are not in line with the facts and some of the explications are less than convincing. I do not intend to address all of them here but just to give one example to illustrate my point.

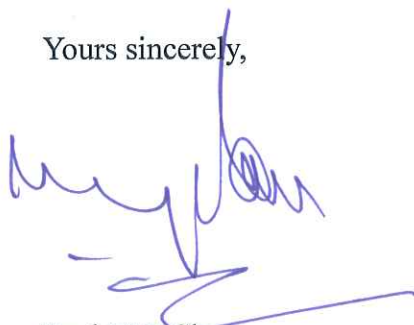
This example relates to my call for the Institute to make comment letters received in response to consultation papers accessible to members. In my last letter to the Council, I questioned why the over 100 submissions in response to the "Consultation on Financial Reporting by Private Companies" last year have not been posted on the Institute's website. The CE asserted in her letter that *"To do this, we need the agreement of members and to date we have not sought this - we have promised our members' anonymity in order to gather the widest range of views possible..."*. As a matter of fact, the Institute has in the past posted on its website comment letters

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received in respect of the two consultations on a similar subject (“Differential Reporting” in 2002 & “SME-Financial Reporting Framework & Standard” in 2004). These comment letters are still available for viewing on the Institute’s website, where you can also find many other comment letters in response to Exposure Drafts. From the same webpage, you can see that the Institute already has a mechanism in place to allow commentators to keep their submissions confidential if they wish.

As the consultation period for the “Proposed Changes to the Practising Certificate Regime” is not yet over, I defer to put forth further views until the Council has the opportunity to visit all the issues raised by various stakeholders.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Paul M P Chan', with a long horizontal flourish extending to the right.

Paul M P Chan

cc Ms Winnie Cheung, Chief Executive