



September 8, 2004

Mr. Peter Martin, CA
Director, Accounting Standards
Canadian Institute of Chartered Accountants
277 Wellington Street West
Toronto, Ontario
M5V 3H2

Dear Mr. Martin:

The Committee on Corporate Reporting (CCR) of Financial Executives International (Canada) (FEI Canada) is pleased to provide its response to the Exposure Draft, *Earnings per Share*. The following remarks are made on behalf of CCR and do not necessarily represent the views of FEI Canada or its members.

FEI (Canada) is an all-industry professional association for senior financial executives, with eleven chapters across Canada and approximately 1,500 members. Membership is generally restricted to senior financial officers of medium and large corporations. CCR is a technical committee of FEI Canada, which reviews and responds to research studies, statements, pronouncements, pending legislation, proposals and other documents issued by domestic and international agencies and organizations.

CCR has reviewed the proposals in the Exposure Draft and concurs with the conclusions reached by the Accounting Standards Board.

CCR hopes its comments will be useful to the AcSB. If you require further clarification with respect to any of our comments, please do not hesitate to contact us.

Yours very truly,

Karyn A. Brooks, CA
Chair
Committee on Corporate Reporting
Financial Executives International (Canada)