

April 25, 2005

Peter Martin, CA  
Director, Accounting Standards  
Accounting Standards Board  
277 Wellington Street West  
Toronto ON M5V 3H2

Dear Sirs:

#### Re-exposure Draft Subsequent Events

The Committee on Corporate Reporting (“CCR”) of Financial Executives International (Canada) (“FEI Canada”) is pleased to have the opportunity to provide comments to the Accounting Standards Board (ASB) on the Re-exposure Draft on Subsequent Events. The following remarks are made on behalf of the Committee 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 to 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,

We are in agreement with the proposed amendments to the March 2004 Exposure Draft which have addressed our issues except that we are concerned with the potential application of the proposed wording in respect of the revision and reissuance of financial statements in the context of a prospectus. The current wording requiring an entity to consider the appropriateness of the subsequent event date where financial statements are reviewed and reissued is ambiguous. In the context of filing a prospectus, there would in almost all cases be a subsequent event, be it the purchase of a new business, investment in new assets, new debt or equity financing, etc. However, the details of the subsequent event are required to be disclosed within the prospectus document negating the need to update the notes to the financial statements. The inclusion of historical statements, or in the case of a short-form prospectus, the reference to financial statements previously filed, is included in the prospectus so that the reader has the benefit of both the financial statements and the subsequent event information without the necessity of the issuer reissuing financial statements. We recommend the ASB clarify what they mean by “the appropriateness of the subsequent event date.” In addition, our preferred solution is to specifically exclude from the requirements of the standard any circumstances where financial statements are issued without change or by more clearly defining what is meant by the “issue” of financial statements to exclude circumstances where they are merely republished without changes or incorporated by reference in a prospectus which includes all the necessary subsequent event disclosures.

CCR hopes its comments will be useful to the ASB. 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 of Corporate Reporting  
Financial Executives International (Canada)