

November 30, 2010

The International Accounting Standards Board
30 Cannon Street
London, United Kingdom
EC4M 6XH

**Re: Exposure Draft ED/2010/12: Severe Hyperinflation
– Proposed Amendment to IFRS 1**

The Committee on Corporate Reporting (CCR) of the Financial Executive International Canada (FEI Canada) is writing to provide its response to the International Accounting Standards Board (IASB) Exposure Draft (ED) ED/2010/12 *Severe Hyperinflation – Proposed amendment to IFRS 1*.

FEI Canada is the all-industry professional membership association for senior financial executives. With eleven chapters across Canada and more than 2,000 members, FEI Canada provides professional development, thought leadership and advocacy services to its members. The association membership, which consists of Chief Financial Officers, Audit Committee Directors and senior executives in the Finance, Controller, Treasury and Taxation functions, represents a significant number of Canada's leading and most influential corporations.

CCR is one of two national advocacy committees of FEI Canada, CCR is devoted to improving the awareness and educational implications of the issues it addresses, and is focused on continually improving the standards and regulations impacting corporate reporting.

Our responses to the specific questions set forth in the ED are:

Question 1:

The Board proposes adding an exemption to IFRS 1 that an entity can apply at the date of transition to IFRSs after being subject to severe hyperinflation. This exemption would allow an entity to measure assets and liabilities at fair value and use that fair value as the deemed cost of those assets and liabilities in the opening IFRS statement of financial position. Do you agree that this exemption should apply when an entity prepares and presents an opening IFRS statement of financial position after being subject to severe hyperinflation? Why or why not?

1. We are in support of the proposed changes in the ED to add the exemption to IFRS 1 to allow an entity that has been subject to severe hyperinflation to

measure assets and liabilities at fair value and to use that fair value as the deemed cost of those assets and liabilities in the opening IFRS statement of financial position when the date of the transition is on, or after, the date when the reporting currency of the reporting entity ceases to be subject to severe hyperinflation. We believe this amendment will increase the number of entities using IFRSs.

Question 2:

Do you have any other comments on the proposal?

1. No further comments on the proposal.

Yours very truly,



Tyrone Cotie
Chair
Committee on Corporate Reporting
FEI Canada