

**From:** Don Roberts

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**Subject:** Audit regulatory reform

In any event my thoughts are that the independent disciplinary committee (IDC) will become a court of first instance and maybe final appeal all rolled into one, and in this position it will be giving judgements on accounting principles, auditing principles and interpretations thereof. In the court systems for law, the judges that hear cases have expertise in certain areas and generally hear only cases in that area; like family law courts, commercial case judges, criminal judges, etc.

On this basis I think the Institute should be proposing and lobbying hard to have expert accountants and auditors on the IDC. Their presence will be essential on all cases to voice an accounting or auditing experts view on the principles being interpreted. I think this is key for a fair hearing as a legal interpretation of the wording of an accounting or auditing standard could be way off the mark due to the accounting terms used which may have different meaning outside of the accounting context.

I would be very concerned if accountants are sitting in front of a panel of lawyers and have to rebut a legal interpretation of standards written by accountants.

Hope this is constructive and please feel free to pass this on to whomever is best to consider it in the Institutes' response.

Best regards,

Don