

The Chairman  
Auditing and Assurance Standards Board  
PO Box 204  
Collins Street West  
Melbourne Victoria 8007  
AUSTRALIA  
By Email: [edcomments@auasb.gov.au](mailto:edcomments@auasb.gov.au)

Grant Thornton Australia Limited  
ABN 41 127 556 389

Level 17, 383 Kent Street  
Sydney NSW 2000  
PO Locked Bag Q800  
QVB Post Office  
Sydney NSW 1230

T +61 2 8297 2400  
F +61 2 9299 4445  
E [info@gtnew.com.au](mailto:info@gtnew.com.au)  
W [www.grantthornton.com.au](http://www.grantthornton.com.au)

18 May 2009

Dear Merran

- ED 09/09: Proposed Auditing Standard ASQC 1 Quality Control for Firms that Perform Audits and Reviews of Financial Reports, Other Financial Information, and Other Assurance Engagements**
- ED 10/09: Proposed Auditing Standard ASA 220 Quality Control for an Audit of a Financial Report and Other Historical Financial Information**
- ED 11/09 Proposed Auditing Standard ASA 210 Agreeing the Terms of Audit Engagements**
- ED 12/09 Proposed Auditing Standard ASA 265 Communicating Deficiencies in Internal Control to Those Charged With Governance and Management**
- ED 13/09 Proposed Auditing Standard ASA 402 Audit Considerations Relating to an Entity Using a Service Organisation**
- ED 14/09 Proposed Auditing Standard ASA 505 External Confirmations**
- ED 15/09 Proposed Auditing Standard ASA 508 *Litigation and Claims***
- ED 16/09 Using the Work of an Auditor's Expert**
- ED 17/09 Comparative Information - Corresponding Figures and Comparative Financial Reports**

Grant Thornton Australia Limited. (Grant Thornton) is pleased to comment on the Auditing and Assurance Standards Board's EDs 09/09 to 17/09.

Grant Thornton's response reflects our position as auditors and business advisers both to listed companies and privately held companies and businesses.

Grant Thornton supports the release of Australian Auditing Standards based on the proposals contained in EDs 01/09 to 08/09.

As a general philosophy, given the commitment to International Auditing Standards, our preference would be for all Australian Auditing Standards to use the exact numbering system of the equivalent International Statement of Auditing Standards issued by the International Auditing and Assurance Standards Board (IAASB) and to refer to the Standards as Australian and International Auditing Standard ISA etc. This would make it clear to readers of Australian Audit Reports that the requirements of the International Auditing Standards have been complied with.

Otherwise we support the release of these proposed standards and have no specific comments to make apart from ED 09/09: Proposed Auditing Standard ASQC 1 Quality Control for Firms that Perform Audits and Reviews of Financial Reports, Other Financial Information, and Other Assurance Engagements

We note that the Accounting Professional and Ethical Standards Board (APESB) has recently approved the issue of a revised APES 320 'Quality Control for Firms' which it is stated is consistent with ISQC 1 apart from reduced requirements in certain areas for non-assurance activities, as was the previous APES 320. We understand that the structure of APES 320 remains in non-clarity format as it was issued in then ED 01/09 format. As advised to the APES Board in our 9 April 2009 submission (copy available on the APESB website), Grant Thornton believes that Australian standards that are based on International standards should be in the same format so that from a global perspective it is clear that Australia is following international standards. On that basis we are supportive of ED 09/09 being released as ASQC1 as it follows the structure and wording of ISQC 1.

If you require any further information or comment, please contact me.

Yours sincerely  
GRANT THORNTON AUSTRALIA LIMITED



Keith Reilly  
National Head of Professional Standards