

From: Tom Maurer <tpmaurer@gmail.com>
Sent: Thursday, August 3, 2023 5:37 PM
To: Comments
Subject: [EXT]: PCAOB Rulemaking Docket 051: Amendments to PCAOB Auditing Standards related to a Company's Noncompliance with Laws and Regulations

In looking at the PCAOB proposed amendment related to a Company's Noncompliance with Laws and Regulations, I believe implementing these procedures would be very difficult. As a former audit partner, unless things have changed dramatically since my retirement, I don't believe audit firms have the skill sets necessary to be able to identify all the legal issues suggested by this amendment. Auditors are not lawyers and I suspect there isn't enough legal expertise on the audit teams to properly address this amendment. This would be especially true regarding the variety of laws applicable to those companies that operate internationally in a number of different countries as well as for companies in regulated industries where new laws and regulations are often updated.

It also sounds like this would result in a substantial increase in audit fees and other costs for companies while at the same time raising the risks of missing things for audit firms. How often might additional significant legal matters, in excess of those that may already arise in a current audit, come up requiring adjustment in the financial statements under the proposed new standards? Unless a large number of such significant issues would be expected to be discovered under this amendment, I'm not sure the benefits would justify the cost.

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Sent from my iPhone