



OPERS Ohio Public Employees Retirement System

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Sent via e-mail to: comments@pcaobus.org

April 15, 2006

Mr. J. Gordon Seymour, Acting Secretary
Public Company Accounting Oversight Board
1666 K Street, N.W.
Washington, DC 20006-2803

Re: PCAOB Rulemaking Docket Matter No. 018, Proposed Auditing Standard on Corrections of Material Weaknesses in Internal Control Over Financial Reporting

Dear Mr. Seymour:

The Ohio Public Employees Retirement System (“OPERS”) is a more than \$64.5 billion fund serving three quarters of a million Ohioans, making the system the 10th largest state pension fund in the U.S. We are writing in response to the Public Company Oversight Board (“PCAOB”) request for comments regarding its proposed auditing standard on reporting on the elimination of a material weakness in internal controls prior to the next annual assessment.

OPERS applauds the PCAOB for proposing a flexible auditing standard for those companies seeking to provide investors with additional reliable information, on an interim basis, that a material internal control weakness has been corrected. According to a recent Glass Lewis & Co. study, in the first quarter of 2005, 263 companies disclosed material weaknesses and, as reported in Compliance Weekly, 582 companies found weaknesses or deficiencies in their internal controls in 2004.

Disclosure of a material weakness in internal controls has the potential to depress a company’s stock price. The elimination of a material weakness, accompanied by an independent auditor’s interim report attesting to management’s assessment of its internal controls, will increase investor confidence in the reliability of a company’s financial statements. The PCAOB has done an exemplary job of responding to public company and investor concerns by proposing this voluntary remediation standard.

Thank you for providing this opportunity to comment. Should you need any additional information, please contact Cynthia L. Richson, Corporate Governance Officer, at 614.222.0398.

Sincerely,

Laurie Fiori Hacking
Executive Director