

July 24, 2007

Public Company Accounting Oversight Board  
Office of the Secretary  
1666 K Street, N.W.  
Washington, DC 20006-2803

By e-mail: [comments@pcaobus.org](mailto:comments@pcaobus.org)

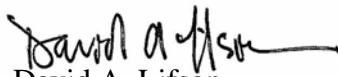
**Re: Proposed Amendments to Limit Board Rule 4003's Fixed Periodic Inspection Requirement to Firms That Regularly Issue Audit Reports  
(Release No. 2007-007; Docket Matter No. 24)**

Dear PCAOB Board Members:

The New York State Society of Certified Public Accountants, representing 30,000 CPAs in public practice, industry, government and education, submits the following comments to you regarding the above captioned release. NYSSCPA thanks the PCAOB for the opportunity to comment.

The NYSSCPA's SEC Practice Committee deliberated the release and drafted the attached comments. If you would like additional discussion with us, please contact Rita M. Piazza, the Chair of the SEC Practice Committee, at (914) 684-2700, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,



David A. Lifson  
President

Attachment



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**COMMENTS ON PCAOB RELEASE NO. 2007-007;  
DOCKET MATTER NO. 24**

**PROPOSED AMENDMENTS TO LIMIT BOARD RULE 4003'S FIXED  
PERIODIC INSPECTION REQUIREMENT TO FIRMS THAT REGULARLY  
ISSUE AUDIT REPORTS**

**July 24, 2007**

**Principal Drafter**

**Robert E. Sohr**

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Ernest J. Markezin

## **New York State Society of Certified Public Accountants**

### **Comment on Proposed Amendments to Limit Board Rule 4003's Fixed Periodic Inspection Requirement to Firms That Regularly Issue Audit Reports**

The New York State Society of CPAs agrees with the Public Company Accounting Oversight Board's (PCAOB) proposed amendments to Rule 4003 (b) as set forth in PCAOB Release No. 2007-007. We consider it reasonable to allow the PCAOB to use discretion for inspections of firms that provide audit reports only irregularly or that play a substantial role in the preparation or furnishing of an audit report but do not issue audit reports.