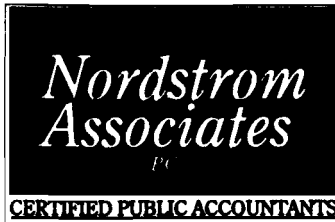


Bruce J. Nordstrom, CPA
Godfrey C. Loper, Jr., CPA
Marjorie T. McClanahan, CPA
Timothy D. Hansen, CPA



MEMBER
American Institute of
Certified Public Accountants
Arizona Society of Certified
Public Accountants

December 12, 2011

Public Accounting Oversight Board
Attention: Office of the Secretary
1666 K Street N.W.
Washington, D.C. 20006-2803

Re: PCAOB Rulemaking Docket Matter No. 37

Dear Reader,

I am writing in my capacity as a forty year professional in public practice and as audit committee chair for Pinnacle West Capital Corporation.

I strongly oppose mandatory audit firm rotation on the grounds that it is impractical and costly. My professional judgement is that audit quality will suffer from mandatory rotation, especially in the early years of a new firm. In addition, the selection, evaluation and retention of audit firms are keystone responsibilities of a public company audit committee. The mandatory rotation of audit engagement partner and concurring partner is highly effective to ensure professional skepticism for our audit engagement. Also, the audit firm managers are frequently rotated off our audit after several years on our engagement.

I also believe the PCAOB's inspection programs should be expanded as an alternative to mandatory audit firm rotation. Our audit committee pays close attention to our audit firm's inspection results. I would also appreciate more portions of the inspection results to be accessible to the public or at least to public clients of the audit firm.

Very truly yours,

A handwritten signature in black ink that reads 'Bruce J. Nordstrom'. The signature is written in a cursive style with a large initial 'B'.

Bruce J. Nordstrom
BJN/nkg