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**Via Email: comments@pcaobus.org**

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

**Re: PCAOB Rulemaking Docket Matter No. 37**

On behalf of Anixter International Inc. (“Anixter”), we are pleased to have the opportunity to address the request for comments on the Public Company Accounting Oversight Board’s (“PCAOB”) proposed *Concept Release on Auditor Independence and Audit Firm Rotation* (the “concept release”). We believe the proposed requirements included in this concept release would not achieve the desired goals of the PCAOB with respect to improving audit quality and financial reporting. Specifically, we do not support the concept of mandatory audit firm rotation.

The proposed concept release, as drafted, would cause unintended consequences including significant increases in audit costs, administrative inefficiencies and diminishing institutional knowledge regarding company specific processes and controls as well as a decline in industry expertise among various audit firms. Further, as a result of the Sarbanes-Oxley Act of 2002, firms are required to rotate audit engagement partners every five years and audit committees were assigned much greater oversight responsibilities. These requirements, along with the rigorous inspection processes of the PCAOB and increased internal and external review procedures within audit firms have increased the quality of audits.

Without any specific evidence that mandatory auditor rotation increases the quality of audits and financial reporting while protecting investors to a greater extent, we would not support the concepts outlined in this release. We strongly believe the significant increase in costs and considerable burdens companies would be under to comply and administer the requirements of mandatory auditor rotation would far outweigh the goals of this concept release.

We appreciate your time and consideration of our comments.

Sincerely,

Theodore A. Dosch  
Executive Vice President – Finance and Chief Financial Officer