

From: [Jack Henry](#)
To: [Comments](#)
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Your proposals for mandatory rotation and identification of the signing partner both strike me as solutions looking for a problem to solve. Neither proposal appears to be based on empirical evidence that the current state is broken and would be improved by either proposal.

I was an audit partner in Arthur Andersen, retiring in 2000 after 34 years. Since then I am serving or have served as an audit committee chair for over one dozen public companies. Rotation of partners has not led to any improvement in audit quality. Without audit team members having several years of experience the newly rotated partner would be less able to fulfill the requisite responsibilities. Firm rotation would cause a deterioration of quality given the length of time an auditor and audit team require to become truly knowledgeable about the client and its business.

Mandatory rotation would be impractical for major companies. Most use several of the Big 4 firms. One does the audit and the other(s) perform the nonaudit prohibited services, thus rendering them not independent and therefore ineligible to propose on becoming the auditor.

I have experienced no evidence of a lack of independence. To the contrary, auditors are even reluctant to provide advice to clients as issues arise. If the board uncovers lack of independence it is more likely that it is behavior by a rogue partner.

Identifying a signing partner is contrary to the way audits are performed. They are done by teams and the teams include more than a single partner. Major decisions are made by national offices, not signing partners.

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