

From: [Carson L. Eddy](#)
To: [Comments](#)
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I have been an auditor for over 40 years (non-public companies), as a result I have seen and participated in many client changes of auditors. Each time a change occurs it becomes more costly not only for the client, in having to go through an orientation process with the new firm, but also the firm which has to incur non-billable hours to become familiar with the client. In most cases it takes at least two years to become totally engaged in the operation of a new client. The change proposed may be directed toward publicly held companies, however it will have a trickledown effect on non public companies and non-profit organizations as well. Mandatory rotation of audit firms will cause a major disruption in the delivery of auditing services at all levels

Auditing firms spend a large amount of their annual budgets on developing the expertise and training necessary to audit specialized industries. This is where the emphasis should be if the PCAOB and the SEC want to improve competence and the proper amount of skepticism in the performance of audits. The PCAOB and SEC should stay out of manipulating the providing of services in a free market.

Thank you for the opportunity to provide input on this important subject.



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