

August 14, 2003

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.005

Members and Staff of the Public Company Accounting Oversight Board:

On behalf of the American Institute of Certified Public Accountants (the "AICPA"), we respectfully request that the Public Company Accounting Oversight Board (the "Board") consider extending the August 18, 2003 deadline for submitting written comments on the Board's proposed rules regarding investigations and adjudications involving registered public accounting firms (the "Proposal").

The AICPA is the largest professional association of certified public accountants in the United States, with more than 350,000 members in business, industry, public practice, government and education. The abbreviated comment period provided for in the Board's proposal provides the AICPA with limited time to solicit input from our numerous members and to prepare meaningful comments on the Board's important proposals. This difficulty is exacerbated, of course, by the fact that the Board issued three proposing releases on the same day and the comment deadline for each of these releases falls in the middle of August, a month in which many people are on vacation.

The AICPA fully recognizes the Board's goal of implementing some of the provisions in the Proposal prior to the October 22, 2003 registration deadline for registered public accounting firms. In view of the length, complexity and significance of the Proposal, however, we believe that both the Board and interested parties would benefit from a longer comment period with respect to those aspects of the proposal not specifically related to the Board's treatment of firm applications for registration.

Accordingly, while the AICPA expects to submit our written comments to the Board by the August 18, 2003 deadline, we would urge the Board to extend the comment period. In addition, we believe that the Board should permit parties who have submitted comments to the Board by the original deadline to supplement their prior submissions.

The AICPA is firmly committed to working with the Board as the Board implements the Sarbanes-Oxley Act of 2002 in a timely and effective manner. In that spirit, we urge the Board to provide interested parties with adequate time to provide meaningful comments that will assist the Board in its development of an extensive body of rules governing Board investigations and adjudications.

Very truly yours,

A handwritten signature in purple ink, reading "Richard I. Miller". The signature is written in a cursive style with a large, prominent initial "R".

Richard I. Miller
General Counsel & Secretary

RIM:dw