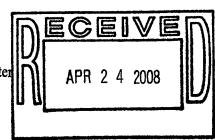
James H. Hance, Jr.
Bank of America Corporate Center
NC1-007-52-17
100 North Tryon Street
Charlotte, NC 28255

April 21, 2008



Office of the Secretary PCAOB 1666 K Street Washington, DC 20006-2803

Gentlemen:

I am providing a comment letter to you on your Proposed Auditing Standard No. 7, *Engagement Quality Review*.

Very simply, I think that what is proposed in this standard would be an additional burden to audit committees and companies with very little return. The Proposal clearly shows that added auditing effort would result. Since the advent of Sarbanes-Oxley, audits appear to be working well and additional burdens are not needed at this time.

I chair an audit committee and have seen first-hand cost versus benefit of a number of the proposed auditing standards, and in my judgment going from a negative assurance by a concurring partner to positive assurances is not beneficial.

Sincerely yours,

James H. Hance, Jr.