

April 30, 2008

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. 025; PCAOB Release No. 2008-002:
Proposed Auditing Standard – Engagement Quality Review and Conforming
Amendment to the Board’s Interim Quality Control Standards**

Dear Sir or Madam:

Ross Stores, Inc. (“Ross” or the “Company”) is pleased to respond to the request for comment from the Public Company Accounting Oversight Board (the “PCAOB” or the “Board”) regarding Release No. 2008-002, *Proposed Auditing Standard – Engagement Quality Review and Conforming Amendment to the Board’s Interim Quality Control Standards*, PCAOB Rulemaking Docket Matter No. 025 (the “Release”).

We agree with the objectives of the Release—that through engagement quality review, audit firms will be able to identify and address audit deficiencies before concluding the audit. We understand that the PCAOB has considered information on this topic from PCAOB inspections and enforcement cases when formulating the proposed standard as well as standards in this area published by the International Auditing and Assurance Standards Board of the International Federation of Accountants and the Auditing Standards Board of the AICPA and from other forums.

Under the existing requirements, the concurring partner is required to review those significant auditing, accounting and financial reporting matters, discuss the engagement team’s identification and audit of high-risk transactions and balances, review documentation on the resolution of significant accounting, auditing and financial reporting matters, review the summary of unadjusted audit differences, read the financial statements and auditor’s report, and confirm with the engagement partner that there are no significant unresolved matters. This concurring partner review is required to be completed before the audit report is released.

The Release indicates that some members of the Board’s Standing Advisory Group believe that the existing requirements “did not provide for a thorough review to achieve the objectives of the requirement and that the reviews generally need to be more robust to provide investors with assurance on the quality of audit engagements.” Please consider the following:

- We believe the concurring review process currently used by our audit firm is sufficiently robust post-Sarbanes-Oxley and question whether the additional engagement quality review requirements would add value. We are also concerned that the incremental effort

and related cost of the review will not be commensurate with any added audit quality. We agree that the concurring partner's attention should center on higher-risk areas and believe the existing concurring partner review requirements already address this objective.

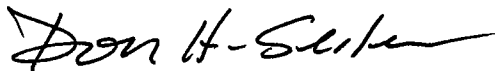
- We are concerned about the impact the additional reviews required by the auditing firm may have on the timing of the Company's earnings releases and regulatory filings. The Company adheres to tight deadlines in order to complete the internal controls over financial reporting and provide sufficient time for management, the independent auditors and the Audit Committee to fulfill their responsibilities of a large accelerated filer.
- We are also concerned with whether our audit firm has sufficient senior partner resources to enable them to meet all of the proposed requirements of engagement quality reviews for all of their public company clients on a timely basis.
- Finally, should this added regulation indeed move forward, we believe that a proposed implementation date for engagement reports issued on or after December 15, 2008 is too aggressive. We request providing a delay in the required effective date of the Release. We believe that the delay in the effective date will allow time for the public firms to address both implementation matters with their clients and resolve potential resource issues.

We appreciate this opportunity to comment, and would be pleased to discuss our letter with you further. If you have any questions or would like to discuss these issues further, please contact John G. Call, Senior Vice President, Chief Financial Officer at (925) 965-4315.

Very truly yours,



John G. Call
Senior Vice President, Chief Financial Officer
Ross Stores, Inc.



Donald H. Seiler
Chairman, the Audit Committee of the Board of Directors
Ross Stores, Inc.

cc: Mike Rudy – Deloitte & Touche