

NEW YORK
CITY BAR

**COMMITTEE ON
FINANCIAL REPORTING**

NORMAN D. SLONAKER
CHAIR
787 SEVENTH AVENUE
ROOM 19-112
NEW YORK, NY 10019
Phone: (212) 839-5356
Fax: (212) 839-5599
nslonaker@sidley.com

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VIA EMAIL TO RULE-COMMENTS@SEC.GOV

Nancy M. Morris, Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-3628

Subject: File Number S7-20-07

Ladies and Gentlemen:

This letter is submitted on behalf of the Financial Reporting Committee of the Association of the Bar of the City of New York (the "Committee") in response to Release Nos. 33-8831, 34-56217, IC 27924, *Concept Release on Allowing US Issuers to Prepare Financial Statements in Accordance with International Financial Reporting Standards* (the "Concept Release").

The Committee is composed of lawyers with diverse perspectives on financial reporting matters, including members of law firms and counsel at major corporations, financial institutions, public accounting firms and institutional investors. A list of members of the Committee is attached as Annex A to this letter.¹

¹ This letter does not necessarily reflect the individual views of each member of the Committee or of the institutions with which they are affiliated.

