

Ladies and gentlemen,

In pursuance with your kind invitation to comment of the exposure draft of proposed ISA 220 (Revised), Quality Management for an Audit of Financial Statements (ED-220) I would like to present certain specific comments on the questions included in your Explanatory Memorandum.

**Question 1**

Do you support the focus on the sufficient and appropriate involvement of the engagement partner(see particularly paragraphs 11–13 and 37 of ED-220), as part of taking overall responsibility for managing quality on the engagement? Does the proposed ISA appropriately reflect the role of other senior members of the engagement team, including other partners?

**Comments**

It is not clear what actions should be done to fulfill p.12 b) and 12e). P.12c) is missed. There is no responsibilities in the draft on signing auditor's report.

**Question 2**

Does ED-220 have appropriate linkages with the ISQMs? Do you support the requirements to follow the firm's policies and procedures and the material referring to when the engagement partner may depend on the firm's policies or procedures?

**Comments**

Excessive linkages and repetitions.

**Question 3**

Do you support the material on the appropriate exercise of professional skepticism in managing quality at the engagement level? (See paragraph 7 and A27–A29 of ED-220)

**Comments**

No, Para.2-7 are excessive and should be excluded. There is no need to repeat requirements of the Code of Ethics and other ISAs.Para.A2. A27-A29 are enough.

**Question 5**

Do you support the revised requirements and guidance on direction, supervision and review? (See paragraphs 27–31 and A68–A80 of ED-220)

**Comments**

Yes

**Question 6**

Does ED-220, together with the overarching documentation requirements in ISA 230, include sufficient requirements and guidance on documentation?

**Comments**

No, they should be added by fulfillment of responsibilities relating to engagement performance, direction, supervision, review and signing the report.

**Question 7**

Is ED-220 appropriately scalable to engagements of different sizes and complexity, including through the focus on the nature and circumstances of the engagement in the requirements?

**Comments**

Yes

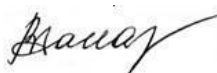
Para.14-19 are excessive and should be excluded. There is no need to repeat requirements of the Code of Etic and other ISAs.Para.A2 is enough.

There is no need to repeat eight components of ISQM 1 in para.A3.

There are no responsibilities in the draft on signing auditor's report.

Hope the comments above will be instrumental for improving the ISA 220.

Best regards,



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