



August 21, 2017

AICPA Professional Ethics Division
1211 Avenue of the Americas
New York, NY 10036-8775

Via e-mail: Ethics-ExposureDraft@aicpa.cima.com

Re: Proposed Interpretation, *Long Association of Senior Personnel With an Attest Client*

Dear Sirs:

The Accounting Principles and Auditing Standards Committee (the Committee) of the Florida Institute of Certified Public Accountants (FICPA) respectfully submits its comments on the referenced proposal. The Committee is a technical committee of the FICPA and has reviewed and discussed the above referenced Exposure Draft of Proposed Interpretation issued by the Professional Ethics Executive Committee. The FICPA has more than 20,000 members, with its membership comprised primarily of CPAs in public practice and industry. The Committee is comprised of approximately 23 members, of whom 48% are from local or regional firms, 26% are from large multi-office firms, 13% are sole practitioners, 9% are in international firms, and 4% are in education. The Committee has the following comments related to the issues posed:

1. The Committee concluded that a self-interest threat exists in any attest client as we are compensated for services provided, whether it is a new or long standing engagement with senior personnel. Therefore, ET sec.1.210.01016 of the Code of Professional Conduct is sufficient in addressing the threat.
2. The proposal of an effective date of the last day of the month in which it is published in the *Journal of Accountancy*, in the Committee's opinion, does not create significant challenges implementing, requiring a delayed effective date.

The Committee appreciates this opportunity to respond to the proposed statement on the proposed interpretation. Members of the Committee are available to discuss any questions or concerns raised by this response.

Respectfully submitted,

Steve Bierbrunner, CPA
Chair, FICPA Accounting Principles and Auditing Standards Committee

Committee members coordinating this response:

Donald K. Hulslander, CPA
Poornima Srinivasan, CPA