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October 12, 2021

Ms. Toni Lee-Andrews  
Director of the AICPA Professional Ethics Division  
AICPA  
220 Leigh Farm Road  
Durham, NC 27707

RE: AICPA Professional Ethics Executive Committee Proposed Interpretation of the AICPA Code of Professional Conduct on Accounting Standards Implementation Services

Dear Ms. Lee-Andrews

We are pleased to respond to the request for public comment on the AICPA Professional Ethics Executive Committee's (PEEC) Proposed Interpretation of the AICPA Code of Professional Conduct (the Code or ET) on Accounting Standards Implementation Services.

Overall, we are supportive of the proposed interpretation and PEEC's efforts to update and improve the effectiveness of its independence interpretations in areas of increasing complexity, such as the implementation of accounting standards. As noted in the explanatory information included in the exposure draft, we agree that the proposed interpretation effectively combines key considerations in delivering accounting standards implementation services and furthers understanding of permissibility and requirements in delivering such services. For these reasons, we support the proposed interpretation as drafted.

\* \* \* \* \*

We appreciate PEEC's consideration of our feedback. If you have any questions regarding our comments included in this letter, please do not hesitate to contact Bill McKeown at [wmckeown@kpmg.com](mailto:wmckeown@kpmg.com) or Nancy Miller at [nancymiller@kpmg.com](mailto:nancymiller@kpmg.com).

Very truly yours,

**KPMG LLP**

Cc: Brian S. Lynch, Chair