

Aug. 2, 2010

LaShaun King, Technical Manager  
AICPA Peer Review Program  
American Institute of Certified Public Accountants  
220 Leigh Farm Road  
Durham, NC 27707-8110

Re: Exposure Draft dated June 1, 2010 "Proposed Revisions to the AICPA Standards for Performing and Reporting on Peer Reviews"

Dear AICPA Peer Review Board Members:

The California Peer Review Committee (Committee) of the California Society of Certified Public Accountants has provided its comments on this exposure draft under a separate cover, but also has addressed our primary area of concern.

The California CPA Education Foundation, a 501(c)3, annually provides live, webcast and self-study CPE to approximately 20,000 customers, representing more than 70,000 registrations. Our Board of Trustees thanks you for the opportunity to comment on this exposure draft.

We agree with your attempts to maintain the independence of the peer review process, however, we would like to suggest a revision to Section .159 (c). As it currently reads, CPE providers such as the California CPA Education Foundation, or any state society-based CPE Education Foundation, would be subject to the Standards. Since it is our understanding that the intent of the Standards is to maintain the independence of the peer reviewer and since our CPE program is already subject to oversight by the National State Boards of Accountancy and the California Board of Accountancy, that Section .159 (c) should be amended as follows:

*c. A third party organization, **which conducts peer reviews, and provides QCM or CPE programs as a primary function of its business.***

Thank you for the opportunity to comment on this matter. We would be glad to discuss our opinions with you further should you have any questions or require additional information.

Very truly yours,

A handwritten signature in black ink that reads "Michelle Walters". The signature is written in a cursive, flowing style.

Michelle Walters, CPA  
President  
California CPA Education Foundation  
Board of Trustees

cc: California Education Foundation Board of Trustees  
California Peer Review Committee