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March 4, 2016

Office of the Secretary  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-1090

**Re: File Reference Number PCAOB-2016-01.**

Deloitte & Touche LLP (“D&T”) is pleased to respond to the request for comments from the U.S. Securities and Exchange Commission regarding the filing by the Public Company Accounting Oversight Board (“PCAOB”) on *Rules on Improving the Transparency of Audits: Rules to Require Disclosure of Certain Audit Participants on a New PCAOB Form and Related Amendments to Auditing Standards* (collectively referred to as the “rules and amendments”).

As explained in the PCAOB’s release that accompanies the rules and amendments, providing information about the engagement partner and certain other participants in the audit will achieve the objective of providing enhanced transparency into the audit process. The more information of value that auditors are able to provide to the users of financial statements, the greater the value and relevance audits will have to the capital markets. Additional transparency regarding the audit also stands to enhance investor confidence in the rigor of the independent audit process. We believe that disclosing the name of the engagement partner and information regarding certain other participants in the audit on a new PCAOB form, *Auditor Reporting of Certain Audit Participants* achieves the objective of providing transparency regarding participants in the audit. We also believe this approach (1) presents a practical and feasible approach to achieving its objective and (2) will result in the requested information being available in a timely, useful, meaningful, and readily accessible form. As a result, we are supportive of the rules and amendments. We are also supportive of the phased effective date for the different aspects of the proposal, as the phased approach will provide for additional time that we believe will be necessary for firms to develop appropriate approaches and systems for gathering the information to support the required disclosures about the involvement of other accounting firms.

D&T appreciates the opportunity to provide our perspectives on these important topics. If you would like to discuss these issues further, please contact Thomas Omberg at [REDACTED], Alex Schillaci at [REDACTED], or Dave Sullivan at [REDACTED].

Very truly yours,

Deloitte & Touche LLP

cc: Mary Jo White, SEC Chair  
Michael S. Piwowar, SEC Commissioner  
Kara M. Stein, SEC Commissioner  
James V. Schnurr, SEC Chief Accountant  
Brian T. Croteau, SEC Deputy Chief Accountant

James R. Doty, PCAOB Chairman  
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