



Tel: +44 (0)20 7486 5888
Fax: +44 (0)20 7487 3686
DX 9025 West End W1
www.bdo.co.uk

55 Baker Street
London W1U 7EU

Mark Babington
Deputy Director of Audit Policy
Financial Reporting Council
8th Floor
125 London Wall
London
EC2Y 5AS

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Direct line: 020 7893 3228
Email: david.isherwood@bdo.co.uk

Dear Mr Babington,

Invitation to Comment - Technical Proposals to Make minor revisions to ISA (UK) 330 (Revised June 2016) The Auditor's Responses to Assessed Risks and ISA (UK) 505 External Confirmations; and Withdraw Practice Note 16 - Bank Reports for Audit Purposes in the United Kingdom (April 2017)

We are pleased to have the opportunity to comment on the FRC's Invitation to Comment - Technical Proposals to make minor revisions to ISA (UK) 330 (Revised June 2016) The Auditor's Responses to Assessed Risks and ISA (UK) 505 External Confirmations and consequently withdraw Practice Note 16 - Bank Reports for Audit Purposes in the United Kingdom (the Proposal).

In summary, we agree with the proposal to make two small amendments to ISA (UK) 330 and ISA (UK) 505 as, in our view, they will achieve the same outcome as the current Practice Note 16 ("PN 16"). We therefore also agree that PN 16 be withdrawn as it represents a guidance document which market practice no longer makes necessary.

Our detailed responses to the specific questions raised in the Invitation to Comment - Technical Proposals are set out in Appendix I to this letter.

Given the subject matter of the consultation, and to the extent it has not already done so, we suggest that the FRC engages in a discussion with the British Bankers' Association ("BBA") or UK Finance (the successor of the BBA) prior to withdrawing PN 16.

If you wish to discuss any of the points further, please do not hesitate to contact me.

Yours sincerely,

BDO LLP
David Isherwood
Partner
For and on behalf of BDO LLP



Appendix I: BDO LLP's Responses to the Questions posed by the FRC in relation to its Invitation to Comment - Technical Proposals to Make minor revisions to ISA (UK) 330 (Revised June 2016) The Auditor's Responses to Assessed Risks and ISA (UK) 505 External Confirmations; and Withdraw Practice Note 16 - Bank Reports for Audit Purposes in the United Kingdom (April 2017)

Question 1) Do you support the FRC's proposals to withdraw Practice Note 16, and replace it with the proposed minor revisions to ISAs (UK) 330 and 505? If not, please give your reasons and explain what action, if any, that you believe should be taken instead.

Yes, we support the FRC's proposal to withdraw PN 16 and replace it with the proposed minor revisions to ISA (UK) 330 and ISA (UK) 505.

PN 16 was originally drafted in consultation with the BBA. PN 16 is operational in nature as it sets out the process that auditors should follow when requesting bank confirmation letters, and provides an agreed and consistent process, supported by templates issued by the BBA for doing so. In our view, this process can still be followed when PN 16 is withdrawn as it now represents market practice. However, we do suggest that the FRC engages in a discussion with the British Bankers' Association ("BBA") or UK Finance (the successor of the BBA) prior to withdrawing PN 16 so to ensure that the template requests, authority to disclose illustrations and BBA's guidance note for banks as set out in Appendixes 1 to 3 are still made available on their websites and that banks continue to follow the process that PN 16 sets out.

Question 2) Is the proposed effective date, which aligns with the FRC's revision of ISA (UK) 250 appropriate? If not, please give reasons and indicate the effective date that you would consider appropriate.

Yes, we agree that the proposed effective date, which is the audit of financial statements from periods beginning on or after 15 December 2017, is appropriate for the revisions to ISA (UK) 330 and ISA (UK) 505 and withdrawal of PN 16.