

December 28, 2011

Comment Letter

International Accounting Standards Board

30 Cannon Street

London EC4M 6XH

United Kingdom

Dear Sir/Madam

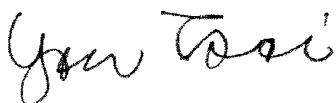
Exposure Draft ED/2011/07 Transition Guidance (Proposed Amendments to IFRS 10)

The Special Task Force of the Financial Accounting Standards Committee (FASC) of Accounting Research and Development Foundation in Taiwan appreciates the opportunity to respond to the above exposure draft.

The attachments are our comments to this exposure draft. The comments are those of the Special Task Force and do not necessarily represent official opinions of the FASC.

If you have any question about our comments, please contact us via yanntsai@ntu.edu.tw.

Sincerely Yours,



Yann-Ching Tsai., Ph.D.

Chairman,

Financial Accounting Standards Committee,

Accounting Research and Development

Foundation, Taiwan

Enclosures—Response to Exposure Draft of Transition Guidance (Proposed Amendments to IFRS 10)

Question 1:

The Board proposes to clarify the ‘date of initial application’ in IFRS 10. The date of initial application for IFRS 10 would be ‘the beginning of the annual reporting period in which IFRS 10 is applied for the first time’. The Board also proposes to make editorial amendments to paragraphs C4 and C5 of IFRS 10 to clarify how an investor shall adjust comparative period(s) retrospectively if the consolidation conclusion reached at the date of initial application is different under IAS 27/SIC-12 and IFRS 10.

Do you agree with the amendments proposed? Why or why not? If not, what alternative do you propose?

Response

We agree with the proposal to clarify the ‘date of initial application’ in IFRS 10.

Question 2:

The Board proposes to amend paragraph C3 of IFRS 10 to clarify that an entity is not required to make adjustments to the previous accounting for its involvement with entities if the consolidation conclusion reached at the date of initial application is the same under IAS 27/SIC-12 and IFRS 10. As a result, the Board confirms that relief from retrospective application of IFRS 10 would apply to an investor’s interests in investees that were disposed of during a comparative period such that consolidation would not occur under either IAS 27/SIC-12 or IFRS 10 at the date of initial application.

Do you agree with the amendments proposed? Why or why not? If not, what alternative do you propose?

Response

We agree with the proposal to clarify that an entity is not required to make adjustments to the previous accounting for its involvement with entities if the consolidation conclusion reached at the date of initial application is the same under IAS 27/SIC-12 and IFRS 10.