

February 12, 2014

Comment Letter
International Accounting Standards Board
30 Cannon Street
London EC4M 6XH
United Kingdom

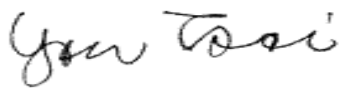
Dear Sir/Madam

Exposure Draft ED/2013/11

The Financial Accounting Issues Task Force of the Taiwan Financial Reporting Standards Committee (TFRSC) of Accounting Research and Development Foundation in Taiwan appreciate the opportunity to respond to the above exposure draft.

The attachments (Attachment 1) are our comments to this exposure draft. If you have any questions about our comments, please contact us via yanntsai@ntu.edu.tw or louise@ardf.org.tw.

Sincerely Yours,



Yann-Ching Tsai., Ph.D.
Chairman,
Taiwan Financial Reporting Standards Committee,
Accounting Research and Development
Foundation, Taiwan

Comments from ARDF Taiwan re Exposure Draft ED/2013/11

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Attachment 1
Exposure Draft ED/2013/11

Opinion on Annual Improvements to IFRSs 2012–2014 Cycle

Questions 1 - Proposed amendment

Do you agree with the IASB's proposal to amend the Standards as described in the Exposure Draft?

If not, why and what alternative do you propose?

Response:

IFRS 5 Non-current Assets Held for Sale and Discontinued Operations

Yes, we agree with the proposed amendments. However, we think that the amended paragraphs mentioned in Paragraph 44K should be 26 and 27-29 instead of 27-29.

IFRS 7 Financial Instruments: Disclosure

Yes.

IAS 19 Employee Benefits

Yes.

IAS 34 Interim Financial Reporting

Yes, we agree that the proposed wording of IAS34.16A is clearer.

Attachment 1
Exposure Draft ED/2013/11

Questions 2 - Transition provisions and effective date

Do you agree with the proposed transition provisions and effective date for the issue as described in the Exposure Draft?

If not, why and what alternative do you propose?

Response:

IFRS 5 Non-current Assets Held for Sale and Discontinued Operations

Yes.

IFRS 7 Financial Instruments: Disclosure

Yes.

IAS 19 Employee Benefits

Yes.

IAS 34 Interim Financial Reporting

Yes, we agree that the proposed transition provisions and effective date are appropriate.