

European Commission  
DG Internal Market and Services  
Mr. Philippe Bui & Mr. Reinhard Biebel  
Accounting Unit F3  
B-1049  
Brussels

11 April 2008

Dear Sirs

**Endorsement of IFRIC 13 *Customer Loyalty Programmes***

We are responding to your invitation to comment on the above questionnaire on behalf of PricewaterhouseCoopers.

Following consultation with members of the PricewaterhouseCoopers network of financial services firms, this response summarises the views of member firms who commented on the questionnaire. 'PricewaterhouseCoopers' refers to the network of member firms of PricewaterhouseCoopers International Limited, each of which is a separate and independent legal entity.

**Overall comments**

We believe it is essential to have a single set of high-quality, global standards so as to enhance comparability of information across territories, industries and companies. That is, we do not, as a matter of principle, support divergence between EU-endorsed IFRS and IFRS as issued by the IASB.

Specifically, our comment letter to the IFRIC dated 6 November 2006 agreed with many of IFRIC's proposals and suggested several areas of the interpretation that could be improved or clarified. We recognise that, in finalising IFRIC 13, the IFRIC and the IASB has followed due process and through that process, has addressed many of the points that we raised.

On both general and specific grounds, therefore, we support endorsement of IFRIC 13.

If you have any questions in relation to this letter please do not hesitate to contact Richard Keys (+44 20 7212 4555) or Tony de Bell (+44 20 7213 5336).

Yours faithfully

PricewaterhouseCoopers LLP