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Our ref : AdK  
Direct dial : Tel.: (+31) 20 301 0391 / Fax: (+31) 20 301 0302  
Date : Amsterdam, 17 December 2009  
Re : Comment on ED 'Limited Exemption from Comparative  
IFRS 7 Disclosures for First-time Adopters'

Dear members of EFRAG,

The Dutch Accounting Standards Board (DASB) appreciates the opportunity to respond to EFRAG's draft comment letter on the Exposure Draft 'Limited Exemption from Comparative IFRS 7 Disclosures for First-time Adopters'.

We concur with your support for the proposed amendment.

We also recognize the concern about the effective date. However, since changing the effective date as suggested would not alter the effective applicability of the amendment, we would regret if changing the exposure draft on this matter would delay the finalization of the amendment process. Moreover, the suggested solution replaces one deficiency – i.e., forced early adoption – by another – i.e., backdating.

Yours sincerely,

Hans de Munnik  
Chairman Dutch Accounting Standards Board