

From: Christine.Sulger@dzbank.de [mailto:Christine.Sulger@dzbank.de]

Posted At: donderdag 19 maart 2009 13:19

Posted To: CommentLetter

Conversation: Antwort: WG: EFRAG's Draft Comment Letter on the ED Consolidated Financial Statements

Subject: Antwort: WG: EFRAG's Draft Comment Letter on the ED Consolidated Financial Statements

Dear Madam/Sir,

thank you very much for the opportunity to comment on your draft regarding your statement concerning ED 10 Consolidated Financial Statement.

On the question of the consolidation regulation we generally share your concerns with regard to whether the exclusive control principle with its criteria "power" and "returns" is sufficient in order to define the limits of consolidation. We opine that a more substantiate definition or a widening by other criteria of the controll principle could be helpful for the decision on consolidation.

Also, in our opinion, the negative definition for structured entities seems to be too generic. Such definition will make it difficult for the reporting entity to make a precise decision. We deem it necessary for the IASB to once again state the criteria more precisely.

We would like to voice major concerns on the extended information in the notes concerning non consolidated structured entities. Though, we understand the intention of the standard setter to provide more transparency for the user in view of the financial market risks, we have considerable doubts that the extent and the level of detail of the requested information is in proportion to the information needs of the user.

In summary we support the comment of the EFRAG on the ED 10.

Kind regards

Christine Sulger

DZ BANK AG

Group Finance
Koordination Grundsatzfragen
F/GFZK
Platz der Republik
60325 Frankfurt am Main

T +49 69 7447 90882

F +49 69 7447 1902

mailto:Christine.Sulger@dzbank.de

DZ BANK AG

Deutsche Zentral-Genossenschaftsbank, Frankfurt am Main
Platz der Republik, 60325 Frankfurt am Main
Deutschland/Germany

<http://www.dzbank.de>, <http://www.125-jahre-dzbank.de>

mailto:mail@dzbank.de, T +49 69 7447 01, F +49 69 7447 1685

Vorstand/Board of Directors: Wolfgang Kirsch (Vorsitzender/Chief Executive Officer),
Dr. Thomas Duhnkrack, Lars Hille, Wolfgang Köhler, Albrecht Merz, Frank Westhoff
Aufsichtsratsvorsitzender/Chairman of the Supervisory Board: Rolf Hildner
Sitz/Registered Office: Stadt Frankfurt am Main, Amtsgericht Frankfurt am Main
Handelsregister/Register of Companies: HRB 45651