



SAS Quadra 05. Bloco J. CFC  
Brasília, Distrito Federal – Brazil  
[www.cpc.org.br](http://www.cpc.org.br)

October 21, 2011  
International Accounting Standards Board  
30 Cannon Street  
London EC4M 6XH  
United Kingdom

**RE: Exposure Draft on Improvements to IFRSs.**

Dear Sir/Madam,

The Comitê de Pronunciamentos Contábeis - CPC (Brazilian Accounting Pronouncements Committee)<sup>1</sup> welcomes the opportunity to comment on the Exposure Draft named *Improvements to IFRSs*.

We are a standard-setting body engaged in the study, development and issuance of accounting standards, interpretations and guidances for Brazilian companies.

Additionally, we urge the Board to address the requirements for comparative information in a broader context. Brazilian corporate law requires financial statements to be published in expensive manners and, in this case, we believe that the cost of providing financial statements beyond the minimum comparative information requirements may outweigh the benefits achievable.

This response summarizes the views of our members, which may be supported by the opinions of external parties, sent to us for analysis and to enhance the discussion on the subject matter. We have also made efforts to encourage other external parties to send comments directly to the IASB.

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<sup>1</sup> The Brazilian Accounting Pronouncements Committee (CPC) is a standard-setting body engaged in the study, development and issuance of accounting standards, interpretations and guidances for Brazilian companies. Our members are nominated by the following entities: ABRASCA (Brazilian Listed Companies Association), APIMEC (National Association of Capital Market Investment Professionals and Analysts), BMFBOVESPA (Brazilian Stock Exchange and Mercantile & Future Exchange), CFC (Federal Accounting Council), FIPECAFI (Financial and Accounting Research Institute Foundation) and IBRACON (Brazilian Institute of Independent Auditors).



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If you have any questions about our comments, please contact us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ernesto Rubens Gelbcke', is written over a horizontal line.

**Ernesto Rubens Gelbcke**  
Technical Vice-Coordinator  
Comitê de Pronunciamentos Contábeis (CPC)