

Ref #428001

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The Director: Standards  
The Independent Regulatory Board for Auditors  
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Dear Sandy van Esch

**SAICA SUBMISSION ON THE PROPOSED SOUTH AFRICA AUDITING PRACTICE STATEMENT ON EXTERNAL CONFIRMATIONS FROM FINANCIAL INSTITUTIONS (SAAPS 6) (REVISED)**

In response to your request for comments on the *Proposed South Africa Auditing Practice Statement on External Confirmations from Financial Institutions (SAAPS 6) (Revised)*, attached is the comment letter prepared by The South African Institute of Chartered Accountants (SAICA).

We thank you for the opportunity to provide comments on this document.

Please do not hesitate to contact us should you wish to discuss any of our comments.

Yours sincerely,

**Ashley Vandiar**  
**Project Director – Assurance and Members’ Advice**

cc: Assurance Guidance Committee

## RESPONSES TO REQUEST TO SPECIFIC COMMENTS

1. *Respondents are requested to indicate whether they find the illustrative, alternative audit procedures, in paragraphs 15 to 17, provide useful guidance when evaluating the completeness of accounts maintained by an entity and when obtaining sufficient appropriate audit evidence from various financial institutions? “Yes / No”*
  - a) *If your answer is “Yes”, do you believe that sufficient guidance is provided; or*
  - b) *If your answer is “No”, please explain what additional procedures you believe should be included, or whether you believe the guidance in paragraphs 15 to 17 should be removed?*

**Response:** Yes, we do believe that sufficient guidance is provided but we suggest that the following additional procedures be added to the last bullet point of paragraph 17:

- Property, plant and equipment: confirm, by tracing a sample of payments for property, plant and equipment to the entity’s financial institution statements, to ensure that the payments were made from one of the entity’s financial institution accounts.
- Other acquisition of non-current assets for example of investments: confirm, by tracing a sample of payments for other non-current assets to the entity’s financial institution statements, to ensure that the payments were made from one of the entity’s financial institution accounts.

The current examples in the last bullet point of paragraph 17 only relates to items of a trading nature and not to transactions of a long term nature. The risk that the entity is using accounts not disclosed to the auditors to make payments is especially present in long term transactions, which will in most cases be once-off transactions and not with established long standing suppliers of the entity.

We also draw the Board’s attention to point (iv) Payments of the last bullet point of paragraph 17. We believe it should be stated that this paragraph relates to general and ad-hoc expense transactions. We are supportive of the guidance provided in paragraphs 15-17 for determining the completeness of financial institution accounts and we believe that this will assist practitioners to design and execute appropriate procedures to address the risk of completeness of bank accounts and transactions.

We recommend that the items listed in the last bullet point of paragraph 17 be updated to state that the auditor will be testing a sample of selections for each item.

We ask the Board to consider changing the “and” to “or” at the end of point (vi) of the third bullet point of paragraph 17, as we do not believe that all these considerations will necessarily be applicable to all audits.

2. *Do respondents believe sufficient guidance has been provided regarding the electronic external confirmation process? “Yes / No”*  
*If “No”, please explain what additional guidance is needed.*

**Response:** Yes, we do believe that sufficient general guidance has been provided regarding the electronic external confirmation process.

We do however draw the Board's attention to the last sentence of paragraph 21 where it states that "...such information does not meet the definition of a confirmation." We recommend replacing the word "confirmation" with "external confirmation certificate", since this concept is defined in the Proposed Statement.

3. *The Illustrative external confirmation requests in **Appendix A** include nine different categories of Form Types relating to a variety of account balances and financial instruments of an entity, that an auditor is most likely to encounter and wish to seek external confirmation about.*

*Flexibility is introduced for an auditor to select only those form types relevant to the audit client's accounts and financial information, for which external confirmation is sought.*

*Respondents are requested to indicate whether:*

- a) They find the format and coverage of the nine form types is sufficiently comprehensive and useful? "Yes / No"*
- b) If "No", please explain what additional categories you encounter and find useful to add.*

**Response:** Yes, we believe the format and coverage of the nine form types are sufficiently comprehensive and useful.

We do however have the following comments on the contents of Appendix A:

- In the last sentence on page 19 of the Proposed Statement (first page of Appendix A), it is indicated that the Appendix is available as an electronic confirmation request form or as a Microsoft Word Template. It doesn't however state where an auditor can obtain this request form or Template and we recommend that this information is included here.
- On page 22 of the Proposed Statement, there is a reference to multiple companies' details that should be listed on the external confirmation certificate request. On the nine forms, it is unclear whether the auditor should list multiple companies on each form in the table at the start of each form, or if a single form should be submitted per company. If multiple companies are listed, it is unclear how the financial institution would indicate which information provided, relates to which company. We believe that the design of the forms should be improved to clarify how information on multiple companies should be requested and aggregated.
- We recommend that the Board review the wording of the last sentence on page 22 of the Proposed Statement, as the meaning of the sentence is unclear. The sentence reads: "Attached is a table of parties involved in this audit external confirmation request process has been included for your review."
- For the Securities, Contingent Liabilities and Guarantees, Derivatives, Bills, Letter of credit, Cash Management Systems and Authorised Transactors / Signatories List Form Types, there is a standard sentence included on each form. This wording reads: "According to our records at the close of business on year/period ended "[Enter Client Year / Period ended]:" with a table that is to be populated by the auditor with columns for account number and type of account. From the standard sentence, it is unclear precisely what information should be populated by the auditor in this table. The design of the forms should

be improved with clear instructions in the different parts to ensure accurate completion by the different parties.

- In the Authorised Transactors / Signatories List Form Type, in the second table, there is a column requiring the financial institution to indicate a Yes or No on whether it was confirmed. It is unclear from whom this confirmation is required.
- The items in the Authorised Transactors / Signatories List Form Type are numbered starting from 6, instead of 1.
- The document has not been designed to include a name, date, sign off and title of the authorised approver of the confirmation letter by the financial institution. We recommend that the design of the document be amended to include these items.

4. *The external confirmation request forms accommodate both manual and electronic external confirmation requests.*

a) *Respondents are requested to indicate whether they believe the standardisation will facilitate a more efficient and effective means to obtain both manual and electronic confirmation certificates from financial institutions, more promptly. “Yes / No”.*

b) *If “No”, please indicate why not.*

**Response:**

Yes - but only if all financial institutions are familiar and in agreement with the formats. Ultimately, only a web-based electronic confirmation process will truly create a more efficient and effective means to obtain these confirmations.

5. *The financial securities included in the “Securities Form Type” in the external confirmation forms in Appendix A are broadly categorised as follows:*

- *Debt securities (debt securities may be called debentures, bonds, deposits, notes or commercial paper depending on their maturity and certain other characteristics);*
- *Equity securities, e.g. common stocks (“safe custody assets”); and*
- *Hybrid securities e.g. preference shares (combination of the characteristics of both debt and equity securities).*

a) *Do respondents agree with this broad categorisation? “Yes / No”*

b) *If No, please suggest an alternative categorisation.*

**Response:** Yes, we agree with the broad categorisation of financial securities on the Securities Form.

6. *The Derivatives Form Type includes a Table for FEC information to be populated by the auditor requesting the external confirmation, but an option is provided for a financial institution to attach their systems generated portfolio of trade / open positions of the entity’s FECs?*

a) *Do respondents believe the Table for FEC information is clear and should be retained in the Derivatives Form Type? “Yes / No”*

b) *If “No”, please provide an alternative request format, for example: the financial institution is requested to provide a print-out of the entity’s “portfolio of trade / open positions”.*

**Response:**

Yes, we believe the table for FEC information is clear and should be retained. Question 6 of the Explanatory Memorandum, which is addressed in this response, states that this table for FEC information should be populated by the auditor. The Proposed Statement indicates in footnote 10 to the Derivatives Form that the financial institution should be completing this table. In addition, the table has not been shaded as an indication that the auditor should furnish the related information. If it was the intention of the Board that the auditor should be populating this table, we recommend that this is clarified in the Proposed Statement.

7. Please indicate category of respondent with an "X" in the table below:

<b>AUDIT FIRMS</b>	
• Large Firm	
• Medium Sized Firm	
• Small Firm	
• Academic	
<b>OTHER (INSERT DETAILS BELOW)</b>	X  Professional Body/Member body

**GENERAL COMMENTS INCLUDING SPECIFIC COMMENTS TO SPECIFIC PARAGRAPHS -**

**WE NOTE THE FOLLOWING GENERAL COMMENTS ON THE PROPOSED STATEMENT FOR THE BOARD’S ATTENTION:**

Reference	Issue	Proposed/Recommendation
First page of Appendix A	<ul style="list-style-type: none"> <li>The first page of Appendix A (planning of the external confirmation request) appears merely to be repetition of paragraphs 6 -7 of the SAAPS.</li> </ul>	<ul style="list-style-type: none"> <li>We recommend that reference to paragraphs 6 – 7 be made on the first page of Appendix A.</li> </ul>
Sample authorization letter from client	<ul style="list-style-type: none"> <li>One only signatory on the sample authorization letter.</li> </ul>	<ul style="list-style-type: none"> <li>It may be appropriate to include place for two authorised signatories on the sample authorisation letter from the client. It is common practice for financial institutions to request a minimum of two signatures on the authorisation letter.</li> </ul>
Cash management systems	<ul style="list-style-type: none"> <li>There seems to be insufficient guidance on the term ‘cash management systems’.</li> </ul>	<ul style="list-style-type: none"> <li>We proposed that further guidance on the term ‘cash management systems’ be included in the proposed guide.</li> </ul>
Paragraph 5, definition of a Financial Institution	<ul style="list-style-type: none"> <li>In paragraph 5, important information in the definition of a Financial Institution has been included by way of a footnote 3 in the Proposed Statement.</li> </ul>	<ul style="list-style-type: none"> <li>We recommend including the information in footnote 3 in the Proposed Statement itself as opposed to having this information as a footnote, since it is essential information that needs to be known by the auditor.</li> </ul>
Paragraph 6	<ul style="list-style-type: none"> <li>The first sentence on paragraph 6 reads as follows:  <i>Having decided to obtain an external confirmation certificate, an auditor plans the submission of the request to the financial institution including.....”</i></li> </ul> <p>This is written in singular whereas most companies/entities have more than one financial institution.</p>	<ul style="list-style-type: none"> <li>We propose that paragraph 6 be written in plural form as follows “Having decided to obtain an external confirmation certificate, an auditor plans the submission of the requests to the financial institutions including.....”</li> </ul>

Paragraph 6, bullet 3	<ul style="list-style-type: none"> <li>This paragraph refers to: “...<i>a sample facility account number;</i>” There is no guidance on the proposed guide on what this means.</li> </ul>	<ul style="list-style-type: none"> <li>We propose that this be clarified and explained.</li> </ul>
Paragraph 10, bullet 3	<ul style="list-style-type: none"> <li>The same information’s detailed under Bullet 4 of Paragraph 6, is being repeated.</li> </ul>	<ul style="list-style-type: none"> <li>We recommend that the information under paragraph 10, bullet 3 be removed/deleted.</li> </ul>
Paragraph 12, bullet 3	<ul style="list-style-type: none"> <li>Refer to the proposed/recommendation Column</li> </ul>	<ul style="list-style-type: none"> <li>We propose the following changes with regard to paragraph 12, bullet 3 – the words “balance sheet” should be changed to “Statement of financial position”.</li> <li>Furthermore we propose that the words “balance sheet ratios” be changed to “financial ratios”.</li> <li>We propose that other paragraphs and the template letters be amended accordingly. (for example, template letter on page 27, point 4)</li> </ul>
Paragraph 12, bullet 3	<ul style="list-style-type: none"> <li>Refer to the proposed/recommendation Column</li> </ul>	<ul style="list-style-type: none"> <li>We propose the following changes with regard to paragraph 12, bullet 4, which reads as follows “<i>Details of total facilities and date for review thereof</i>”. We propose that it be changed to read as follows “Details of total <u>available</u> facilities and date for review thereof”.</li> <li>We propose that other paragraphs and the template letters be amended accordingly. (for example, template letter on page 27, point 5)</li> </ul>
Paragraph 14 and 24	<ul style="list-style-type: none"> <li>We believe that paragraph 24 provides very good guidance on procedures that can be performed to validate the source of the electronic information and therefore evaluate the reliability of the external confirmation certificate. In contrast, paragraphs 13 and 14 only indicate that alternative procedures can be performed to evaluate the reliability of the</li> </ul>	<ul style="list-style-type: none"> <li>We believe that it will be useful to auditors if reference is made in paragraph 14 to paragraph 24 in relation to electronic external confirmation and that possible additional procedures to evaluate the reliability of manual external confirmation certificates, are added to paragraph 14.</li> </ul>

	external confirmation certificate, but it doesn't give examples of what those alternative procedures might be.	
Page 18 of the Proposed Statement, in the second last sentence of paragraph 27	<ul style="list-style-type: none"> <li>On page 18 of the Proposed Statement, in the second last sentence of paragraph 27, it is stated that "To assist the financial institutions in furnishing the required information expeditiously, an auditor ensures that these shaded sections are completed, and <i>schedules are attached...</i>"</li> </ul>	<ul style="list-style-type: none"> <li>We request the Board to consider indicating for which specific items schedules should be attached, in order to make it clear to the auditor, and avoid possible delays in the external confirmation process.</li> </ul>
Paragraph 17, bullet 5	<ul style="list-style-type: none"> <li>This paragraph currently reads as follows:  <i>"Select a sample of financial institution account transfer transactions from each of the entity's financial institution account financial institution statements before and after period end date and trace the receipt or payment to one of the entity's corresponding financial institution account financial institution statements; and ...."</i></li> </ul>	<ul style="list-style-type: none"> <li>We propose that transfer transactions close to year end be selected as well.</li> </ul>
Page 25, point 4	<ul style="list-style-type: none"> <li>reads as follows:  <i>"Exceptions and/ or Auditor's Comments from the auditor for financial institution"</i></li> </ul>	We propose that clarity be provided as we do not understand what this sentence means or what is being requested.



**GENERAL COMMENTS INCLUDING SPECIFIC COMMENTS TO SPECIFIC PARAGRAPHS - WE PROPOSE THAT THE FOLLOWING SENTENCES BE REPHRASED AS FOLLOWS:**

Paragraph/page reference	Extract from Proposed SAAPS 6	Suggested corrections
Paragraph 11	<ul style="list-style-type: none"> <li>Refer to the proposed/recommendation Column</li> </ul>	<ul style="list-style-type: none"> <li>We propose the following changes (refer to bold areas):   <i>“The importance of obtaining external confirmation certificates is not only to confirm the financial institution balances and interest received / paid for the period under review but for all the “other disclosures” that are requested from the financial institution in the external confirmation request. <del>Many of the</del> <b>The</b> “other disclosures” are used by <del>an</del> <b>the</b> auditor as corroborative audit evidence to support specific disclosures made by the entity in its financial statements.”</i> </li> </ul>
Paragraph 12	<ul style="list-style-type: none"> <li>Refer to the proposed/recommendation Column</li> </ul>	<ul style="list-style-type: none"> <li>We propose the following changes (refer to bold areas):   <i>“External confirmation requests from financial institutions <del>ordinarily often</del> include confirmation of the following details regarding “other disclosures”:</i> </li> </ul>
Paragraph 17, First Sentence	<ul style="list-style-type: none"> <li>Refer to the proposed/recommendation Column</li> </ul>	<ul style="list-style-type: none"> <li>We propose the following changes (refer to bold areas):   <i>“The procedures, an auditor may perform in order to obtain sufficient appropriate audit evidence to support the completeness of financial institution account balances is a matter of professional judgment based on the specific circumstances of the entity and the risk that the financial institutions account balances <del>are</del> <b>maybe</b>-incomplete.”</i> </li> </ul>

Paragraph 17, bullet 1	<ul style="list-style-type: none"> <li>Refer to the proposed/recommendation Column</li> </ul>	<ul style="list-style-type: none"> <li>We propose the following changes (refer to bold areas):   <i>“Compare the list of financial institution accounts held by the entity at the end of the current financial year to those held in the immediately preceding financial year. <del>Investigate the reasons for and obtain explanations</del> <b>Obtain and confirm reasons for any changes</b> in financial institution accounts; ”</i></li> </ul>
Paragraph 17, bullet 2	<ul style="list-style-type: none"> <li>Refer to the proposed/recommendation Column</li> </ul>	<ul style="list-style-type: none"> <li>We propose the following changes (refer to bold areas):   <i>“Inspect the minutes of the executive meetings of the entity held during the year under review to <del>determine</del> <b>identify</b> if any new financial institution accounts were opened or whether any financial institution accounts were closed during the year under review. <b>Follow these through to where it has been accounted for;</b> “</i></li> </ul>
Paragraph 17, bullet 3 – first sentence	<ul style="list-style-type: none"> <li>Refer to the proposed/recommendation Column</li> </ul>	<ul style="list-style-type: none"> <li>We propose the following changes (refer to bold areas):   <i>“Inspect the minutes of the executive meetings of the entity held during the year under <del>review</del> <b>audit</b> to determine if any: ”</i></li> </ul>
Paragraph 17, bullet 7	<ul style="list-style-type: none"> <li>Refer to the proposed/recommendation Column</li> </ul>	<ul style="list-style-type: none"> <li>We propose the insertion of the word “however” as indicated below:   <i>“The following audit procedures that may already be performed as audit procedures on other account balances and classes of transactions may be performed, <b>however the</b> <del>The</del> transactions may need to be traced to specific financial institution account number statements in order to meet the objective of obtaining evidence regarding the completeness of financial institution account balances.”</i></li> </ul>

Paragraph 17, bullet 7, (i), (ii), (iii), (iv)	<ul style="list-style-type: none"> <li>The word “confirm” is used a lot in the procedures listed under this paragraph, bullet 7. “Confirm” is not an audit procedure verb.</li> </ul>	<ul style="list-style-type: none"> <li>We recommend that the word “confirm” be replaced with the appropriate audit procedure verbs such as observe, inquire, calculate, recalculate, analytical procedures and inspect.</li> </ul>
Paragraph 22	<ul style="list-style-type: none"> <li>Refer to the proposed/recommendation Column</li> </ul>	<ul style="list-style-type: none"> <li>We propose the following changes (refer to bold areas):   <i>“Any confirmation response involves risks relating to reliability because proof of the source or origin might be difficult to establish and alterations can be difficult to detect. Such risk exists regardless of <b>how the response is obtained</b> <del>whether a response is obtained in paper form, by electronic correspondence, or through some other medium.</del></i>   <i><del>Confirmation responses received electronically</del> However, <b>electronic responses</b> involve additional risks relating to reliability. Accordingly, an auditor assesses the reliability of the information obtained through the electronic confirmation response, taking into account risks that:....”</i> </li> </ul>
Paragraph 23, first sentence	<ul style="list-style-type: none"> <li>Refer to the proposed/recommendation Column</li> </ul>	<ul style="list-style-type: none"> <li>We propose the following changes (refer to bold areas):   <i>“<del>The possible</del> <b>Possible</b> controls that may be put in place over access to electronic confirmations may include: ”</i> </li> </ul>
Paragraph 24, bullet 1	<ul style="list-style-type: none"> <li>Extract:   <i>“If information is provided via facsimile response, an auditor may verify the source and contents of the facsimile response by directly contacting the intended confirming party (e.g., by a telephone call to the intended confirming party) as well as asking the confirming party to send the original back in the mail.”</i> </li> </ul>	<ul style="list-style-type: none"> <li>We propose that the words in bold be clarified.   <i>“If information is provided via facsimile response, an auditor may verify the source and contents of the facsimile response by directly contacting the intended confirming party (e.g., by a telephone call to the intended confirming party) as well as asking the confirming party to send the original <b>back in the mail.</b>”</i> </li> </ul>

<p>Paragraph 24, bullet 2</p>	<ul style="list-style-type: none"> <li>Extract: <i>“If information is provided via an e-mail response, an auditor could verify the source and contents of the e-mail response, such as verifying the e-mail address of the intended confirming party or contacting the intended confirming party by telephone as well as asking the confirming party to send the original back in the mail.”</i></li> </ul>	<ul style="list-style-type: none"> <li>We propose that the words in bold be clarified. <i>“If information is provided via an e-mail response, an auditor could verify the source and contents of the e-mail response, such as verifying the e-mail address of the intended confirming party or contacting the intended confirming party by telephone as well as asking the confirming party to send the original <b>back in the mail.</b>”</i></li> </ul>
<p>Paragraph 27</p>	<ul style="list-style-type: none"> <li>Refer to the proposed/recommendation Column</li> </ul>	<ul style="list-style-type: none"> <li>We propose the following changes (refer to bold areas): <del>An</del><b>The</b> auditor selects only those individual <i>Form Types</i> relevant for the entity being audited and sends them to the applicable financial institution for confirmation instead of sending all nine <i>Form Types</i> with their external confirmation request. The sections of the external confirmation request that are to be completed by <b>the an</b> auditor, or where <b>the-an</b> auditor has to furnish schedules, have been shaded in Appendix A. To assist the financial institutions in furnishing the required information expeditiously, <b>the an</b> auditor <b>should</b> ensures that these shaded sections are completed, and schedules are attached prior to sending the external confirmation request to the financial institution. Incomplete external confirmation requests may delay the process of obtaining the external confirmations from financial institutions.</li> </ul>
<p>Page 19, Appendix A, at the top</p>	<ul style="list-style-type: none"> <li>Heading extracted: <i>“Planning <u>of</u> the external confirmation request”</i></li> </ul>	<ul style="list-style-type: none"> <li>We propose that this heading should be change to read as follows: <i>“Planning the external confirmation request”</i></li> </ul>

Page 19, Appendix A, bullet 5	<ul style="list-style-type: none"> <li>Sentence reads as follows: <i>“Ascertaining where to send the request.”</i></li> </ul>	<ul style="list-style-type: none"> <li>We propose that this heading should be change to read as follows: <i>“Ascertaining<del>ing</del> where to send the request.”</i></li> </ul>
Page 19, Appendix A, second last paragraph	<ul style="list-style-type: none"> <li>Paragraph reads as follows: <i>“An auditor needs to be aware that financial institutions cannot provide information about legal entities that are not covered by an authority from the audit client to disclose such information. This means that details will be provided by the financial institution of all accounts and facilities relating to an entity and its accounts listed on the request for an external confirmation certificate, for which there is a current authority.”</i></li> </ul>	<ul style="list-style-type: none"> <li>We propose that this heading should be change to read as follows: <i>“<del>An</del> The auditor needs to be aware that financial institutions cannot provide information about legal entities that are not covered by an authority from the audit client to disclose such information. This means that details will be provided by the financial institution of all accounts and facilities relating to an entity and its accounts listed on the request for an external confirmation certificate, for which there is a current authority.”</i></li> </ul>
Page 20, First Sentence	<ul style="list-style-type: none"> <li>reads as follows: <i>“To be edited as appropriate and typed on the auditor’s letterhead”</i></li> </ul>	<ul style="list-style-type: none"> <li>we propose the following changes <i>“To be edited as appropriate and <del>typed</del> copied on the auditor’s letterhead”</i></li> </ul>
Page 21, First Sentence	<ul style="list-style-type: none"> <li>reads as follows: <i>“To be edited as appropriate and typed on the auditor’s letterhead”</i></li> </ul>	<ul style="list-style-type: none"> <li>we propose the following changes <i>“To be edited as appropriate and <del>typed</del> copied on the auditor’s letterhead”</i></li> </ul>
Page 22, last sentence of the example letter	<ul style="list-style-type: none"> <li>reads as follows: <i>“Attached is a table of parties involved in this audit external confirmation request process has been included for your review.”</i></li> </ul>	<ul style="list-style-type: none"> <li>we propose the following changes <i>“Attached is a table of parties involved in this audit external confirmation request process <del>has been included for your review.</del>”</i></li> </ul>

Page 24, Point 1	<ul style="list-style-type: none"> <li>reads as follows:   <i>“All balances on Cheque, Deposit, Savings Bank, and other accounts of the above named client and associated interest received by and accrued to above named client for the period "Beginning Date" to "End Date" were:”</i></li> </ul>	<ul style="list-style-type: none"> <li>we propose the following changes:   <i>“<del>All</del> balances on Cheque, Deposit, Savings <del>Bank</del>, and other accounts of the above named client and associated interest received by and accrued to above named client for the period "Beginning Date" to "End Date" were:”</i></li> <li>remove the word “all” as the bank is confirming only authorised accounts, therefore the bank might not be confirming all accounts.</li> <li>remove the word “bank”</li> </ul>
Page 28, point 1	<ul style="list-style-type: none"> <li>reads as follows:   <i>“Securities held by you for our account:”</i></li> </ul>	<ul style="list-style-type: none"> <li>we propose the following changes:   <i>“Securities held by <del>you</del> the financial institution for <del>our</del> client’s account:”</i></li> </ul>
Page 28, point 2	<ul style="list-style-type: none"> <li>reads as follows:   <i>“Securities out for transfer to our name:”</i></li> </ul>	<ul style="list-style-type: none"> <li>we propose the following changes:   <i>“Securities out for transfer <del>to our</del> in client’s name:”</i></li> </ul>
Page 29, point 4	<ul style="list-style-type: none"> <li>reads as follows:   <i>“Amounts payable or due from us:”</i></li> </ul>	<ul style="list-style-type: none"> <li>we propose the following changes:   <i>“Amounts payable <del>to</del> or due from <del>us</del> client:”</i></li> </ul>
Page 30 , first sentence	<ul style="list-style-type: none"> <li>reads as follows:   <i>“According to our records at the close of business on year/period ended”</i></li> </ul>	<ul style="list-style-type: none"> <li>We propose the following changes:   <i>“According to <del>our</del> the institution’s records at the close of business on year/period ended”</i></li> <li>This change should be applied to: <ul style="list-style-type: none"> <li>○ page 34 third sentence</li> <li>○ page 36 first sentence</li> <li>○ page 38 first sentence</li> <li>○ page 39 first sentence</li> </ul> </li> </ul>