

Phone: 81-3-3515-1130 Fax: 81-3-5226-3356 E-mail: international@jicpa.or.jp http://www.jicpa.or.jp/n_eng

August 10, 2009

Technical Director
International Public Sector Accounting Standards Board
International Federation of Accountants
277 Wellington Street West
Toronto Ontario Canada M5V 3H2

Comments on the Proposed International Public Sector Accounting Standard, "Intangible Assets"

Dear Sir:

The Japanese Institute of Certified Public Accountants (JICPA) is pleased to comment on the Proposed International Public Sector Accounting Standard, "Intangible Assets" (the "ED"), as follows:

On "Specific Matters for Comment"

Do you agree that the changes made to IAS 38, in particular the scope exclusions set out in paragraphs 2 and 4, and the additional public sector guidance are:

- Necessary in the circumstances?
- Appropriately reflected in the revised wording?

We agree with this proposal.

Yours sincerely,

Yasuo Kameoka

Executive Board Member - Public Sector Accounting and Audit Practice

The Japanese Institute of Certified Public Accountants

Takao Kashitani

Executive Board Member - Public Sector Accounting and Audit Practice

The Japanese Institute of Certified Public Accountants