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JICPA Comments on the IFAC Consultation Paper
Translation of IFAC Standards

The Japanese Institute of Certified Public Accountants (“we”, “our”, and “JICPA”) is pleased to provide you with our comments on the IFAC Consultation Paper, *Translation of IFAC Standards*.

We understand that the main objective of this Consultation Paper is to seek comments on the current positions when there are several quality translations per language, and the language is used in several countries. In terms of “one quality of IFAC Standards translation”, there is no concern in Japan because Japanese is used only in Japan. However, we have the following comments, based on our experience in translation of IFAC standards in the past:

1. Period of time to maintain the translated standards

Paragraph 4 (b) states “The translating body plans to complete the initial translation of the standards within a reasonable period of time.” On the other hand, it also states “... and to maintain the translated standards by translating new or revised standards for a specified period of time (e.g., a minimum of three years).” In the area of International Auditing Standards, if there are revisions such as conforming changes and substantial changes, we should give more priority to addressing substantial revisions. We should maintain translations in order of the priority, not in a specified period of time. Therefore, we believe that the period of time to maintain the translated standards should be “within a reasonable time”, in the same way as the initial translation.

2. Translation memory software

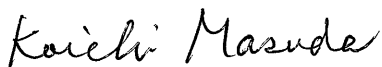
Paragraph 6 (c) states “The translators will be required to use translation memory software recommended by IFAC to enhance the consistent translation and maintenance of key terms.”, and paragraph 8 states “The translating body will be required to provide IFAC with an

electronic version of the translated standards, the list of key terms, and the translation memory generated by the translation software as well as any updates made to such material.”

The Consultation Paper does not explain what the translation memory software is. We doubt whether IFAC will be able to recommend the best software for each language, and whether the standards translated with the software will achieve the best quality. In addition, some translation bodies would outsource the first draft translation. It is not realistic to ask all of the external-translators to use the software recommended by IFAC. Therefore, we believe that it is neither practical nor appropriate, from a cost / benefit point of view, to request all translators to utilize the recommended translation software.

In closing, we wish to express our appreciation for this opportunity to comment on this Consultation Paper.

Sincerely yours



Koichi Masuda

Chairman and President

The Japanese Institute of Certified Public Accountants