

境軍務大樓

Audit Commission 26<sup>th</sup> Floor Immigration Tower

7 Gloucester Road Wanchai, Hong Kong

圖文傳真 Facsimile : 2824 2087 泡 活 Telephone : 2829 4204

晋 第 E-mail ; andrew\_jc\_chang@aud.gov.hk 酸 bh Website : http://www.aud.gov.hk

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24 November 2010

Mr Steve Ong Director, Standard Setting Hong Kong Institute of Certified Public Accountants 37th Floor, Wu Chung House 213 Queen's Road East Wanchai, Hong Kong

(Fax: 2865 6776)

Dear Mr Ong,

## Invitation to comment on IASB Exposure Draft of Leases

Thank you for your letter of 16 September 2010 inviting the Audit Commission to comment on the captioned subject.

We agree with the proposed new accounting model for leases in which a lessee would recognize an asset (the right-of-use asset) representing the lessee's right to use an underlying asset during the lease term, and a liability for lease payments arising under the lease contract. We consider that through adopting a consistent approach to lease accounting for both lessees and lessors, the proposal would provide more complete information to users of financial statements and improve the transparency of lease accounting.

Yours sincerely,

(Andrew Chang) for Director of Audit