

Hans Hoogervorst
International Accounting Standards Board (IASB)
30 Cannon Street

London EC4M 6XH
United Kingdom

Weinheim, 06/07/2014

Dear Mr Hoogervorst,

Re: Board redeliberations on DP/2013/1

We learned with great interest about the IASB's redeliberations on DP/2013/1 *A Review of the Conceptual Framework for Financial Reporting* some weeks ago.

It is our understanding that the Conceptual Framework is one of the most important elements of accounting regulations and an essential basis for a high quality principles-based financial reporting. Therefore, we see the IASB's work on the framework project as an exceptional chance to improving the fundamentals of international financial reporting. Nevertheless, we are concerned that some of the decisions tentatively taken by the Board could be an obstacle to the further development of a clear and concise concept underlying (future) IFRSs.

With that said we do not agree with the IASB's decision not to fundamentally reconsider all aspects of the Conceptual Framework and rather "cobble" existing weaknesses. The Board itself labels its activities as updating, improving and filling in gaps. This is justified – amongst other things – by time restrictions. We strongly recommend the IASB to reconsider its timetable and add more importance to further research work on several topics. Developing a convincing and helpful Conceptual Framework requires a comprehensive and accurately elaborated underlying concept. This would not only allow the Board to develop concise and principles-based financial reporting standards but also enable preparers to deduce consistent and robust accounting principles. Therefore, the IASB should not provide detailed guidance on important topics like capital distinction, measurement and other comprehensive income (OCI) on a standard level only but discuss those topics on a Conceptual Framework level.

We would also like to direct your attention to our comment letter on DP/2013/1 approaching issues like the authoritative status of the framework and some of the topics mentioned above. If you have any further questions please do not hesitate to contact us.


Kind regards,

Vereinigung zur Mitwirkung an der Entwicklung des
Bilanzrechts für Familiengesellschaften e.V. (VMEBF)


Prof. Dr. Dieter Truxius


Peter Krieg


Volker Christ


Prof. Dr. Norbert Winkeljohann

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