© DRSC e.V. ‖ Zimmerstr. 30 ‖ 10969 Berlin ‖ Tel.: (030) 20 64 12 - 0 ‖ Fax.: (030) 20 64 12 -15
www.drsc.de - info@drsc.de

Diese Sitzungsunterlage wird der Öffentlichkeit für die DSR-Sitzung zur Verfügung gestellt, so dass dem Verlauf der Sitzung gefolgt werden kann. Die Unterlage gibt keine offiziellen Standpunkte des DSR wieder. Die Standpunkte des DSR werden in den Deutschen Rechnungslegungs Standards sowie in seinen Stellungnahmen (Comment Letters) ausgeführt.
Diese Unterlage wurde von einem Mitarbeiter des DRSC für die DSR-Sitzung erstellt.

DSR – öffentliche SITZUNGSUNTERLAGE

DSR-Sitzung:	**133. / 02.07.2009 / 09:00 – 11:00Uhr**
TOP:	**133_04 – ED Income Tax**
Thema:	**Zweiter Entwurf der Stellungnahme**
Papier:	**133_04c_ED_Income Tax_EFRAG_Antworten_Draft**

Deutsches Rechnungslegungs Standards Committee e.V.
Accounting Standards Committee of Germany ®

DRSC e. V. • Zimmerstr. 30 • 10969 Berlin

Telefon +49 (0)30 206412-12
Telefax +49 (0)30 206412-15
E-Mail info@drsc.de

Berlin, 3 July 2009

EFRAG
Stig Enevoldsen
13-14 Avenue des Arts
B-1210 Brussels
Belgium

Dear Stig,

EFRAG Draft Comment Letter on IASB Exposure Draft *Income Taxes*

On behalf of the German Accounting Standards Board (GASB) I am writing to comment on EFRAG's draft comment letter on the IASB Exposure Draft *Income Taxes*. We appreciate the opportunity to comment on EFRAG's draft comment letter.

Overall, we agree with EFRAG's significant concerns regarding the proposals included in the ED. However, we have a different view regarding the definition of xxx. We disagree with the proposed definition of xx.

Regarding your questions on pages 19, 23 and 28 of your draft comment letter we have the following comments:

- Your question on page 19 (related to the IASB Question 10): We do support the view pointed out in (b) and disagree with the proposal and suggest changing paragraphs B31 and B32 ED from a practical point of view.
- Your question on page 23 (related to the IASB Question 13c): We have a different view regarding the alternative approach. In our view, the alternative approach will provide more useful information. It complies with the temporary approach not only as on the first time recognition but also in subsequent periods. Therefore, it leads to more intuitive results. The alternative approach, similar to the proposed approach, does not completely eliminate arbitrary results. Nevertheless, we consider applying a pro rata or other appropriate method in cases where 'backwards tracing' is not practicable, a reasonable approach which makes it possible to allocate tax expense in a way consistent with the applicable tax jurisdiction.
- Your question on page 28 (related to the IASB Question 18): We do not support the retrospective application due to a cost benefit relation we prefer a prospective application of the standard. If a retrospective application will be postulated by the IASB, we will claim an allocation of catch-up effects within retained earnings.

For the detailed comments we refer to our comment letter to the IASB's Exposure Draft, which we attach to this letter.

If you would like to discuss any aspects of this comment letter in more detail, please do not hesitate to contact me.

Yours sincerely,

Liesel Knorr

President