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Berlin, 27 October 2010

Dear Françoise,

**EFRAG's Draft Comment Letter on the Exposure Draft ED/2010/10 Removal of Fixed Dates for First-time Adopters - Proposed amendments to IFRS 1**

On behalf of the German Accounting Standards Board (GASB), I am writing to comment on EFRAG's draft comment letter on the IASB's Exposure Draft ED/2010/10 'Removal of Fixed Dates for First-time Adopters – Proposed amendments to IFRS 1'. We appreciate the opportunity to comment on EFRAG's draft comment letter.

The GASB agrees with EFRAG's support for the proposals. Our comment letter to the IASB is attached to this letter.

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

Yours sincerely,

*Liesel Knorr*  
President



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Sir David Tweedie  
Chairman of the  
International Accounting Standards Board  
30 Cannon Street  
London EC4M 6XH  
United Kingdom

Berlin, 27 October 2010

Dear David,

**Exposure Draft ED/2010/10 Removal of Fixed Dates for First-time Adopters - Proposed amendments to IFRS 1**

On behalf of the German Accounting Standards Board (GASB) I am writing to comment on the IASB Exposure Draft ED/2010/10 'Removal of Fixed Dates for First-time Adopters – Proposed amendments to IFRS 1'. We appreciate the opportunity to comment on the ED.

The GASB agrees with the proposals and the reasoning set out in the basis for conclusions. In this context we recommend that the fixed dates (1 January 2005) in par. D2 and D3 of IFRS 1 will be removed as well because references to 1 January 2005 have become obsolete as the date of transition to IFRSs for all new first-time adopters will be after that date.

If you would like to discuss our comments further, please do not hesitate to contact me.

Yours sincerely,

*Liesel Knorr*  
President

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