## Deloitte.

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August 18, 2004

Jonathan G. Katz Office of the Secretary Securities and Exchange Commission 450 Fifth Street, NW Washington, D.C. 20549-0609

## Re: File No. PCAOB-2004-06

## <u>PCAOB Rule Regarding Certain Terms Used in Auditing and Related Professional</u> <u>Practice Standards</u>

Dear Mr. Katz:

Deloitte & Touche LLP is pleased to respond to the request for comments from the Securities and Exchange Commission (the "SEC") regarding the filing by the Public Company Accounting Oversight Board (the "PCAOB" or the "Board") of its Rule 3101, *Certain Terms Used in Auditing and Related Professional Practice Standards*, PCAOB Rulemaking Docket Matter No. 009 (the "Rule").

We are supportive of the Rule, as adopted by the Board on June 9, 2004, and have no comments of substance. We recommend that the SEC adopt the Rule as presented by the PCAOB.

If you have any questions or would like to discuss any issues related to the Rule, please contact Robert J. Kueppers at (203) 761-3579 or John A. Fogarty at (203) 761-3227.

Very truly yours,

/s/ Deloitte & Touche LLP

cc: Chairman William H. Donaldson Commissioner Cynthia A. Glassman Commissioner Harvey J. Goldschmid Commissioner Paul S. Atkins Commissioner Roel C. Campos

> William J. McDonough, Chairman of the PCAOB Kayla J. Gillan, Member Daniel L. Goelzer, Member Willis D. Gradison, Member Charles D. Niemeier, Member