September 30, 2009

International Accounting Standards Board  
30 Cannon Street  
London EC4M 6XH  
United Kingdom  

Dear Sir

Re: IAA comments on the Exposure Draft on Discount Rate for Employee Benefits  
Proposed Amendments to IAS 19

In response to the request for comments on the August 2009 Exposure Draft on Discount Rate for Employee Benefits (Proposed Amendments to IAS 19), I am pleased to transmit on behalf of the International Actuarial Association (IAA) our comments and recommendations.

These comments have been prepared by the Pensions and Employee Benefits Committee of the IAA. If, upon reading these comments, you identify any points that you would wish to pursue, please do not hesitate to contact the chairperson of the committee, Esko Kivisaari, or any other members of the committee. The IAA will be pleased to develop these ideas further with you.

Yours sincerely

Yves Guérard  
Secretary General

Attachment: IAA comments
International Actuarial Association
The International Actuarial Association (the “IAA”) represents the international actuarial profession. Our sixty-two Full Member actuarial associations represent more than 95% of all actuaries practicing around the world. The Full Member associations of the IAA are listed in an Appendix to this statement. The IAA promotes high standards of actuarial professionalism across the globe and serves as the voice of the actuarial profession when dealing with other international bodies on matters falling within or likely to have an impact on the areas of expertise of actuaries.

Due Process
These comments have been prepared by the Pensions and Employee Benefits Committee, the members of which are listed in an Appendix to this statement. It has also been subject to the due process required for it to constitute a formal view of the IAA, and will be posted to the IAA’s official web site.

IAA Comments and General Remarks
We thank the Board for the opportunity to comment on the proposals presented in ED/2009/10 on the urgent matter of amending the definition of the discount rate under IAS 19 to be used in countries where the market in high quality corporate bonds is not deemed to be deep. Our comments are as follows:

- We support the recommendations put forward by the Board. In particular, we agree with the first two questions and have nothing to add to our earlier discussions with the IASB-Staff in discussing the various aspects of this amendment. Question 3 is an accounting matter on which the IAA would not comment.

- Our only suggestion would be that the Board should consider whether the amendment be extended to IFRS for SMEs too. This could be brought into effect by deleting the third sentence in section 28.17: “In countries with no deep market in such bonds, the entity shall use the market yields (at the reporting date) on government bonds.”

We would be pleased to provide further information or answer any questions the Board may have.
Appendix A

Members of the IAA Pensions and Employee Benefits Committee

Esko Kivisaari Chairperson
Gary Ryan Hibbard Vice-Chairperson
Yoshihiro Oyama Vice-Chairperson
Valery Baskakov
Philippe Demol Association Royale des Actuaires Belges
Yasuyuki Fujii Japanese Society of Certified Pension Actuaries
Alfred E. Gohdes Deutsche Aktuarvereinigung e.V.
Bozenna Hinton Institute of Actuaries of Australia
Curtis E. Huntington American Society of Pension Professionals & Actuaries
Martin Janecek Czech Spolecnost Aktuaru
James Richard Kehoe Society of Actuaries in Ireland
Sylvestre Konin Institut des Actuaires de Cote d'Ivoire
Martin Kosztolanyi Slovenska Spolocnost Aktuarov
Asa Larson Svenska Aktuarieföreningen
José Roberto Montello Instituto Brasileiro de Atuaria (IBA)
José Muriel Del Sordo Colegio Nacional de Actuarios A.C.
Konrad Niklewicz Association Suisse des Actuaires
Ieva Ose Latvijas Aktuariju Asociacija
John Parks American Academy of Actuaries
Hannu Parviainen Suomen Aktuaariyhdistys
Irene Paterson Faculty of Actuaries
Manuel Peraita Huerta Instituto de Actuarios Espanoles
Eduard Ponds Het Actuarieel Genootschap
Gediminas Rackauskas Lietuvos aktuariju draugija
Ksenija Sanjkovic Hrvatsko Aktuarsko Drustvo
David Serr Israel Association of Actuaries
Colin Southey Actuarial Society of South Africa
Anne Grete Steinkjer Den Norske Aktuarforening
K Subrahmanyam Institute of Actuaries of India
Thomas S Terry Conference of Consulting Actuaries
Joan Angel Vergés Guerra Col.legi d'Actuaris de Catalunya
Jill M Wagman Canadian Institute of Actuaries
Appendix B

Full Member Associations of the IAA
Consejo Profesional de Ciencias Económicas de la Ciudad Autónoma de Buenos Aires (Argentina)  
Institute of Actuaries of Australia (Australia)  
Aktuarvereinigung Österreichs (AVÖ) (Austria)  
Association Royale des Actuaires Belges (Belgique)  
Instituto Brasileiro de Atuária (IBA) (Brazil)  
Bulgarian Actuarial Society (Bulgaria)  
Canadian Institute of Actuaries/Institut Canadien des Actuaires (Canada)  
Caribbean Actuarial Association  
Actuarial Institute of Chinese Taipei (Chinese Taipei)  
Institut des Actuaires de Côte d'Ivoire (Côte D'Ivoire)  
Hrvatsko Aktuarsko Drustvo (Croatia)  
Cyprus Association of Actuaries (Cyprus)  
Česká Společnost Aktuářů (Czech Republic)  
Den Danske Aktuarforening (Denmark)  
Egyptian Society of Actuaries (Egypt)  
Eesti Aktuaaride Liit (Estonia)  
Suomen Aktuaariryhmä (Finland)  
Institut des Actuaires (France)  
Deutsche Aktuarvereinigung e.V. (DAV) (Germany)  
Hellenic Actuarial Society (Greece)  
Actuarial Society of Hong Kong (Hong Kong)  
Magyar Aktuárus Társaság (Hungary)  
Félag Islenskra Tryggingastærðfræðinga (Iceland)  
Institute of Actuaries of India (India)  
Persatuan Aktuaris Indonesia (Indonesia)  
Society of Actuaries in Ireland (Ireland)  
Israel Association of Actuaries (Israel)  
Istituto Italiano degli Attuari (Italy)  
Institute of Actuaries of Japan (Japan)  
Japanese Society of Certified Pension Actuaries (Japan)  
Latvijas Aktuaru Asociacija (Latvia)  
Lebanese Association of Actuaries (Lebanon)  
Lietuvos Aktuariju Draugija (Lithuania)  
Persatuan Aktuari Malaysia (Malaysia)  
Colegio Nacional de Actuarios A.C. (Mexico)  
Association Marocaine des Actuaires (Morocco)  
Het Actuarieel Genootschap (Netherlands)  
New Zealand Society of Actuaries (New Zealand)  
Den Norske Aktuarforening (Norway)  
Pakistan Society of Actuaries (Pakistan)  
Actuarial Society of the Philippines (Philippines)  
Polskie Stowarzyszenie Aktuarium (Poland)
Instituto dos Actuários Portugueses (Portugal)
Academia de Actuarios de Puerto Rico (Puerto Rico)
Russian Guild of Actuaries (Russia)
Udruženje Aktuara Srbije (Serbia)
Singapore Actuarial Society (Singapore)
Slovenska Spolocnost Aktuarov (Slovakia)
Slovensko Aktuarsko Drustvo (Slovenia)
Actuarial Society of South Africa (South Africa)
Col.legi d'Actuaris de Catalunya (Spain)
Instituto de Actuarios Españoles (Spain)
Svenska Aktuarieföreningen (Sweden)
Association Suisse des Actuaires (Switzerland)
Society of Actuaries of Thailand (Thailand)
Faculty of Actuaries (United Kingdom)
Institute of Actuaries (United Kingdom)
American Academy of Actuaries (United States)
American Society of Pension Professionals & Actuaries (United States)
Casualty Actuarial Society (United States)
Conference of Consulting Actuaries (United States)
Society of Actuaries (United States)