



California State Teachers'  
Retirement System  
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Public Company Accounting Oversight Board  
Attention: Office of the Secretary  
1666 K Street, NW  
Washington, DC 20006-2803

**VIA EMAIL: [comments@pcaobus.org](mailto:comments@pcaobus.org)**

**Re: Rulemaking Docket Matter No. 029, PCAOB Release No. 2015-004 – Supplemental Request for Comment: Rules to Require Disclosure of Certain Audit Participants on a New PCAOB Form.**

Dear Members of PCAOB:

This letter is sent to you on behalf of the California State Teachers' Retirement System (CalSTRS). CalSTRS is a public pension fund that was established for the benefit of California's public school teachers over 100 years ago. CalSTRS serves the investment and retirement interests of approximately 880,000 plan participants. As of June 30, 2015, the CalSTRS portfolio was valued at approximately \$191 billion on both a domestic and an international basis.

CalSTRS is a long-term investor, and like other investors in the global capital markets, we need to have confidence in the services performed by the external auditor for companies held in our investment portfolio. CalSTRS believes that the work performed by a company's external auditor is an extremely valuable means through which shareholders receive reasonable assurance that the company's financial statements are fairly presented and free from material misstatements. For this reason, we appreciate the opportunity to comment on PCAOB Release No. 2015-004, *Supplemental Request for Comment: Rules to Require Disclosure of Certain Audit Participants on a New PCAOB Form*.

CalSTRS is supportive of Public Company Accounting Oversight Board's (PCAOB) efforts to enhance transparency in corporate financial reporting by requiring the disclosure of the engagement partner on the new PCAOB form, Form AP. We believe the required disclosure of the engagement partner on Form AP will lead to enhanced transparency in corporate financial reporting, which will benefit investors as it increases confidence in the financial statements. Furthermore, the disclosure will increase personal accountability that can improve audit quality.

Preferably, CalSTRS believes that the auditor's report is the appropriate place for the disclosure of the engagement partner's name since it is currently where communication takes place between the auditor and investors. However, we are mindful of the potential logistic or liability concerns in mandating the engagement partner disclosure on the auditor's report so we are also supportive of the Form AP as an alternative location for the disclosure. Nonetheless, this is under the assumption that the engagement partner names will be housed in a database that is easily accessible, searchable and downloadable from the PCAOB's website, otherwise, investors may not be inclined to use it. We also presume that the database will store the engagement partner information as well as any necessary pertinent context where investors, financial statement users and other third-party vendors can easily retrieve any current or historical information for analysis in a meaningful way as it may relate to audit quality.

In regards to the filing timeline, CalSTRS believes the required disclosure information on the Form AP should be filed within 10 days, as opposed to 30 days, after the auditor's report has been included in the Securities Exchange Commission filing as timely information is more relevant and useful for investors. Also, we do not think it should be too difficult or costly for a company to obtain and compile the information to disclose on the Form AP once the auditor's report has been issued.

CalSTRS believes that the required disclosure of the engagement partner on Form AP should be applied equally to all auditors, including those of emerging growth companies (EGCs). Under the JOBS Act, EGCs have exemptions from certain accounting and auditing reporting requirements, however, we do not think that the identification of the engagement partner on Form AP will pose an unreasonable challenge or impact on their limited resources. In fact, we believe that it will allow greater visibility in the market for EGCs, which is beneficial for investors.

Lastly, it should be noted we are also supportive of having the engagement partner disclosed in the audit committee report in the company's proxy statement as another alternative. CalSTRS uses the proxy statement to obtain information on the auditor, such as their audit and non-audit fees and services, in determining the auditor ratification vote. Similarly, any information on the engagement partner would potentially be useful when we cast our auditor ratification votes.

Overall, CalSTRS finds that the disclosure of the engagement partner on the Form AP can benefit investors and improve transparency and accountability in corporate financial reporting. CalSTRS appreciates the opportunity to comment on this Supplemental Request. If you have any questions please do not hesitate to contact me.

Sincerely,



Anne Sheehan  
Director of Corporate Governance