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March 22, 2002

The Secretary-General
International Accounting Standards Boards
30 Cannon Street, London EC4M 6XH
United Kingdom

Dear Sir/Madam

This letter responds to the International Accounting Standards Board (IASB) Exposure Draft of a Proposed Amendment to IAS 19, Employee Benefits: the Asset Ceiling. On behalf of the Korea Accounting Standards Board (KASB), I commend the IASB for its continuing efforts to improve international accounting standards and appreciate the opportunity to comment on the exposure draft of amendment to IAS 19.

The comments addressed in this letter have been developed by the International Accounting Standards Review Committee (IASRC) of the KASB and does not represent an official position of the KASB. Official positions of the KASB are determined only after extensive due process and deliberation to which this letter has not been subjected.

The remainder of this letter provides the IASRC's comments on questions (number 1 through 4) raised in the exposure draft.

Question 1. Is the issue identified of sufficient importance to warrant a limited amendment to IAS 19 ?

Yes.

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Question 2. If so, does the proposed amendment to IAS 19 (paragraph 58A) appropriately address the issue? Does it create any anomalies? If the proposed amendment is inappropriate, can you suggest an alternative?

The IASRC believes that the issue has been well addressed in the proposed amendment to IAS 19 in paragraph 58A.

Question 3. Should the limited changes become effective for accounting periods ending on or after 31 March 2002, with earlier application encouraged (paragraph 159A)?

Yes.

Question 4. Do you agree that there should be no specific transitional provisions for the limited changes proposed in this exposure draft?

Yes. IASRC believes that there should be no specific transitional provisions for the limited changes in the exposure draft.

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Again, thank you for the opportunity to comment on the exposure draft of a proposed amendment to IAS 19. The IASRC is willing to address any questions or concerns with regard to the above comments at your convenience. Such should be forwarded to Jaewon Yoon, KASB staff at jwyst1@kasb.or.kr.

Sincerely,

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Kyung-Ho Kim
Chairman, International Accounting Standards Review Committee
Vice Chairman, Korea Accounting Standards Board