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FRANCE

Attn.: Mr. Fabrice Demarigny

Your ref
CESR/03-323b

Our ref
EG/laa

Date
20.11.2003

**DRAFT RECOMMENDATION FOR ADDITIONAL GUIDANCE REGARDING
THE TRANSITION TO IFRS**

With reference to your consultation paper of October 2003 the Group of Large Norwegian Companies would like to express our views.

We believe it is unfortunate that CESR or others asks for additional requirements to what is stated from IASB. Clarifications should be sought through IASB and other authoritative bodies should be reluctant to issue additional requirements.

In order to adjust to IFRS in due time, the pressure lies with the companies. Few companies will be able to report reliable quantitative information about the re-adjustments effects with enough reliability before the actual transition takes place. Also qualitative information is hard to achieve, since the companies understanding of IFRS and it's consequences for their own operation, is a continuous process that will go on until the final transition has been made.

A reliable quantification cannot take place before the opening balance has been established and structure and reporting routines according to IFRS have been decided on and tested. Directions that require or call on for information at an earlier stage, is in our view not adequate for the users as the given information is expected to be highly uncertain.

In our opinion the delays within IASB, according to original plan, should be given consequences with regard to the expectations to the companies reporting. This should also be taken into consideration in the evaluation of whether or not to require that Quarterly Results in 2005 should be worked out according to IFRS. Even though we presume that most of the companies will produce the Quarterly Results for 2005 according to IFRS principles, it is our opinion that CESR should not require this.

We thank you for the opportunity to express our opinions on the consultation paper.

Yours faithfully,

Eiliv Gjesdal

on behalf of the Group of Large Norwegian Companies

- Aker Kværner
- Norsk Hydro
- Orkla
- Schibsted
- Telenor