

The CFA Institute
Professional Standards and Advocacy Department
PO Box 3668
Charlottesville
VA 22903

25 January 2005

Comment on the Guidance Statement on Verifier Independence

Dear Sir

Thank you for affording us the opportunity to respond to the proposed Guidance Statement on Verifier Independence.

General Comments

1. *Do you agree with the principles established in the Guidance Statement?*
Agree.

The statement that a verifier must not step into a management role or undertake any management function or a decision-making role in GIPS implementation and compliance process, should be included in the guiding principles.

The questions and answers under Applications were very useful and we strongly recommend that they be kept in the Guidance Statement.

2. *Are there other elements involved in verifier independence that are not included?*

Point 1 Page 5 Last bullet: "Providing templates and systems for performance calculation"

We do not believe that providing formulae for calculations would impact on independence, but we do believe that providing GIPS systems would. This last bullet point is somewhat ambiguous and should clarify exactly what is meant. We suggest this would be in line with Application 4 (page 7).

3. *Do you agree with the proposed Effective Date?*

This statement could become effective as soon as it is adopted.

Yours faithfully

Carl de Wet, Chairman & Delene Hamman
Investment Management Association of South Africa
GIPS Standing Committee