

Ms. Vanessa A. Countryman
Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

8 October 2026

**Re: Securities and Exchange Commission Release No. 34-106372
(File No. PCAOB-2026-01), Public Company Accounting Oversight Board;
Notice of Filing of Proposed Rules on Amendments to QC 1000, *A Firm's System
of Quality Control*, and Related Rule and Forms**

Dear Ms. Countryman:

Ernst & Young LLP is pleased to provide comments to the Securities and Exchange Commission (SEC or Commission) on the proposed amendments to QC 1000, *A Firm's System of Quality Control*, and its related rules and forms that were adopted by the Public Company Accounting Oversight Board (PCAOB) and submitted to the SEC for approval. We appreciate the opportunity to share our perspectives with the Commission.

We support SEC approval of the PCAOB's adopted amendments to QC 1000. As noted in our comment letter to the PCAOB,¹ we believe the final standard benefits from greater consistency with ISQM 1,² reduces incremental costs that would outweigh the benefits and focuses on the matters most important to advancing audit quality. We also believe the proposed amendments appropriately reflect insights gained through implementation that could not have been fully anticipated earlier in the rulemaking process, resulting in a more practical and operable standard.

We commend the SEC and the PCAOB for their continued engagement with stakeholders throughout the standard-setting process. We also appreciate the PCAOB's efforts to support implementation by issuing guidance and other communications that promote a consistent understanding and application of the requirements. We believe that the SEC, the PCAOB and stakeholders will continue to gain valuable insights during the initial years of implementation. Accordingly, we emphasize the importance of continued communication among all parties and encourage the PCAOB to provide additional implementation guidance, as appropriate.

¹ [EY comment letter to PCAOB, 9 July 2026.](#)

² The quality control standard of the International Auditing and Assurance Standards Board (IAASB), International Standard on Quality Management (ISQM) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements* (ISQM 1).

We also encourage the SEC and the PCAOB to undertake a robust post-implementation review (PIR) before considering further amendments to the standard. A PIR would allow the SEC and the PCAOB to evaluate whether the standard is achieving its intended objectives, identify and assess implementation challenges, and understand the actual costs and benefits. This would help inform any future amendments.

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We would be pleased to discuss our comments with the Commission or its staff at its convenience.

Very truly yours,

Ernst & Young LLP

Copy to:

SEC

Paul Atkins, Chairman
Mark T. Uyeda, Commissioner
Kurt Hohl, Chief Accountant