



CHARTERED  
SECRETARIES  
特許秘書

Licensing Department  
Securities and Futures Commission  
8/F Chater House  
8 Connaught Road Central  
Hong Kong

20 August 2010

Dear Sirs,

**Re: Consultation Paper Concerning the Regulatory Oversight of Credit Rating Agencies**

We refer to the above consultation paper.

Being one of the founder members of Corporate Secretaries International Association (CSIA), we fully endorse CSIA's research report titled *Twenty Practical Steps to Better Corporate Governance*. In this report, one of the contributing academics, Professor William Judge, remarked that "rating agencies had failed to evaluate risk properly" and that "there needs to be a wholesale revision of rating agencies and the national and international debt rating system".<sup>1</sup>

We welcome and support the proposed regulation of credit rating agencies with a view to promoting the independence and objectivity of these agencies and to improving the quality of their ratings.

We leave your Commission and the industry to come up with details of the regulatory model.

We have no objection to your disclosing our submission to the public.

Thank you.

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<sup>1</sup> R.I. (Bob) Tricker, *Twenty Practical Steps to Better Corporate Governance*, March 2010, p. 24.  
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