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To the Partners
Accuity LLP
and the Center for Public Company Audit Firms Peer Review Committee

We have reviewed the system of quality control for the accounting and auditing practice of Accuity LLP (the firm) applicable to non-SEC issuers in effect for the period ended May 31, 2007, and have issued our report thereon dated January 7, 2008. The matter described below was not considered to be of sufficient significance to affect the opinion expressed in that report, which should be read in conjunction with this letter.

Engagement Performance

Comment – The firm’s policies and procedures with respect to audit clients using third-party service organizations do not require additional testing of information provided by third party service organizations when there is a proper report on internal control. We noted instances, including an audit of an employee benefit plan, in which the firm placed reliance on service providers’ reports in the areas of investment valuation and participant investment elections, but did not perform significant additional testing. However, we were satisfied that overall, the firm did perform sufficient audit procedures on these engagements.

Recommendation – The firm should revise its policies and procedures to require performance of specific testing to support reliance on service providers’ reports on internal control. In addition, the firm should communicate and emphasize these requirements to its audit staff.

LeMaster & Daniels PLLC

Spokane, Washington
January 7, 2008

January 24, 2008

CPCAF Peer Review Committee
c/o American Institute of Certified Public Accountants
Palladian 1
220 Leigh Farm Road
Durham, NC 27707

Ladies and Gentlemen:

This letter represents our response to the letter of comment issued in connection with our firm's peer review for the period ended May 31, 2007. All of the necessary changes to our quality control policies and procedures will be closely monitored by our quality control and managing partners. In addition, the matter discussed in this letter will be given special emphasis in our monitoring procedures.

Engagement Performance

In January 2008, the firm revised its policies and procedures to require performance of specific testing to support reliance on service organization internal control reports. The policy change and relevant auditing standards were communicated to all personnel responsible for the planning and oversight of audit engagements at a meeting, and to the general staff population via e-mail and posting to the firm's intranet.

Sincerely, .



Acuity LLP

KKT/DMT/WKL:cjk