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edition followed in 2001 which incorporated bundle anchor and standing tree anchor guidelines amongst other concerns. There have been significant advances in cable yarding technology over the last decade or so, necessitating the production of this the third edition of the Handbook. This edition has addressed

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Year 1 ICFR costs far exceeded the SEC's (and probably Congress') initial expectation. The key reason for this mismatch between expectations and reality is the discovery that prior to the enactment of §404 and despite the existence of the Foreign Corrupt Practices Act, ICFR was not a high priority of either companies or their auditors.

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