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审计收费信息强制披露的经济后果性研究
——来自中国审计市场的证据[1]

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摘要

2001年开始实施的上市公司审计收费信息强制披露制度，其目的在于缓解投资者的信息不对称程度，从而改善中国审计环境。其实施效果如何，本文对此进行了初步的考察和检验。结果发现，在审计收费信息强制披露之后，中国审计市场审计收费差异显著缩小。同时，进一步研究发现过低的审计收费一定程度上损害了审计质量。总体上，本文支持审计收费强制披露改善审计环境的结论。

关键词：审计收费、信息披露、经济后果性、制度环境
中图分类号：F239；F275

一、引言

长期以来，我国注册会计师审计市场处于过度竞争的格局，而这种“恶性竞争”由于缺乏法律监管容易导致审计收费的过度打折以及审计质量的下降（李爽、吴溪，2002；夏冬林、林震昃，2003）。为了改善公司治理、缓解股东与管理层/审计师之间的信息不对称，借鉴澳大利亚和美国的经验，中国证监会于2001年12月24日发布了“《公开发行证券的公司信息披露规范问答》第6号的通知”（以下简称为“6号通知”），要求上市公司自2001年公开披露审计及相关服务收费信息。审计收费信息强制披露制度效果如何，是加剧了中国审计市场的恶性竞争，还是改善了中国审计市场的结构，自然成为新近争论的焦点。政策制定者认为，聘任会计师事务所并知晓其报酬是股东的一项权利，审计收费信息的公开有助于考察会计师事务所的独立性和遵守职业道德的情况，有助于降低市场参与者的信息不对称程度，从而提高审计质量（中国证监会，2001）。

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但是，理论界却认为信息披露管制的效果依赖于管制所处的制度环境，如果制度环境不成熟，不恰当的管制可能导致社会整体福利的下降（Stigler, 1964；吴文锋、胡弋游、吴冲锋、芮萌，2005）。[3]当前我国审计市场依然不发达，依然处于买方市场阶段，加上各种制度不完善，这决定了会计师事务所之间争夺客户的竞争必然是激烈的，甚至是残酷的或者是不正当的，这种竞争的激烈性在争夺有限的上市公司中显得更为突出。在上述的制度环境下，审计收费信息的强制披露可能更加恶化处于弱势地位的会计师事务所的处境，导致其审计收费持续下降，甚至审计独立性的削弱。注册会计师为了维持利润不变，自然可能通过替换高技能的注册会计师、减少审计时间的投入以压缩审计成本，进而损害社会公众的利益。

鉴于此，本文具体考察2001年开始的审计收费信息强制披露政策对我国审计市场的影响。首先，我考察了首次披露审计收费信息的随后年度——2002年上市公司审计收费变动的情况，结果发现，2002年审计收费的增幅与其上期审计收费水平显著负相关，这意味着过低/过高审计收费的极端状况在审计收费信息强制披露之后有所改善，而上述现象在审计收费首次披露的2001年度并不明显。随后，我进一步检验了异常审计收费对审计质量的影响，结果发现，过低的审计收费一定程度上损害了审计质量。总体上，本文支持审计收费强制披露改善审计环境的结论。

本文主要在以下两个方面作出了贡献：(1)尽管信息披露管制引起了研究者持久的关注，但是目前依然存在诸多悬而未决的问题，例如信息披露管制的成本与收益、信息披露管制理论与证据的协调等（Leuz and Wysocki, 2008）。本文研究了中国上市公司审计收费信息披露管制的经济后果，为上述研究领域提供了来自转型经济体的新证据。(2)审计收费水平及其变化是审计领域的重要问题（陈杰平、苏锡嘉、吴溪，2005），本文从信息披露管制的视角说明信息不对称是影响审计收费水平及其变化的重要因素，从而为我们理解审计市场提供了新的思路。

本文以下内容安排如下：第二部分为我国审计市场的制度背景介绍，以及审计收费信息披露对审计收费变动影响的理论分析，并提出待检验的研究假设；第三部分为研究设计和数据来源，描述所采用的研究模型、样本选择过程以及样本数据的描述性统计；第四部分为论文的实证结果和分析，具体描述和分析统计检验的结果；第五部分进一步研究审计收费信息披露对会计盈余价值相关性的影响；第六部分为研究结论。

二、制度背景与理论分析

竞争对审计市场的影响，存在两种截然相反的观点：审计价值提升观和审计价值毁损观。在审计价值提升观看来，适当的市场竞争有助于提高客户与审计师之间的匹配程度，减少由于两者不匹配所导致的效率损失，进而增进社会福利。具体的，市场竞争可以减少审计市场的信息不对称程度以及更换审计师的交易成本，提高审计师变更的概率促使审计师与客户之间的良性匹配，此外，预期到审计任期的

[3] Stigler(1964)发现美国20世纪初期再融资管制政策损害了美国资本市场的效率；吴文锋、胡弋游、吴冲锋、芮萌(2005)同样发现，在我国证券市场基础制度不完善的情况下上市公司再融资门槛的设置无法保证资本配置效率的改善。

缩短不仅有助于缓解注册会计师因为任期延长所导致的迟钝，而且削弱了注册会计师对客户的经济依赖性，从而提高审计质量（Jeter and Shaw, 1995）。

上述观点与美国监管部门不谋而合，例如，1976年美国参议院下属的“报告、会计和管理委员会”发布的研究报告认为，对审计业务公开招揽的禁令（降低审计市场的竞争的举措）损害了社会公众的利益，因为审计服务的使用者由此被剥夺了各种用于评价审计类型、审计数量和审计收费所必须的信息享有权（Metcalf Committee, 1976）；美国司法部反垄断局（Antitrust Division of the Justice Department）在针对审计业务公开招揽禁令的批评时也持有相同的观点。[4]来自美国审计市场的经验证据也支持审计质量提升观。针对上个世纪80年代美国各州关于审计业务公开招揽禁令的实施与解除对审计市场的影响，Jeter and Shaw（1995）发现该禁令的解除不仅没有损害审计质量，相反还促进了审计质量的提供，具体的，在控制其他影响“非标”意见的因素之后，对应当出具“非标”意见的公司，禁令解除的州相比实施禁令的州更容易被出具“非标”意见，在小公司样本中变现更为明显；同时，禁令的解除大大便利了客户基于成本节约动机的审计师变更决策（Chaney, Jeter and Shaw, 1997），具体的，在控制其他影响审计师变更的因素之后，禁令解除的州相比实施禁令的州更容易出现由“八大”审计师变更为另一“八大”审计师；此外，禁令的解除也没有对小规模的审计师造成竞争上的损害（Chaney, Jeter and Shaw, 1995），他们发现，审计师从“非八大”变更为“八大”的现象在禁令解除的州相与实施禁令的州之间并不存在显著差异。

不过，对于处于制度转型的中国，审计价值毁损观可能是更为普遍的观点。该观点认为，过度的竞争非但不能导致社会福利的增加，反而会造成审计市场的无序和混乱，进而损害社会福利（夏冬林、林震昃，2003），因为过度竞争可能迫使注册会计师展开压价式的竞争、刺激其过度的削减成本（Cohen Commission, 1978）、以及采用各种不正当的竞争手段（夏冬林、林震昃，2003）。中国证券监管部门对中国会计师事务所的执业检查证实了上述情况的存在（中国证监会，1998）。[5]

审计收费过低，使得执业质量大打折扣，甚至连最基本的审计程序也不履行（中国证监会，1998）。Simon and Francis (1988)经验研究表明，审计市场的确存在系统性降低审计收费以获得客户的现象，即“低价揽客（low-balling）”，而“低价揽客”将对注册会计师的独立性造成不利影响。由此，审计师的“低价揽客”现象自然成为中国监管部门关注的焦点和监管的重点。中国证监会和中国注册会计师协会2002年联合下发的“炒鱿鱼、接下家”政策就重点关注会计师事务所变更过程中下一家会计师事务所审计收费是否严重低于上一家会计师事务所的情形，并将与之进行详细约谈，提醒维持审计质量。2007年，财政部和证监会联合颁布的《财政部证监会关于会计师事务所从事证券期货相关业务有关问题的通知》进一步明确，“具有证券资格的会计师事务所存在下列情形之一的，财政部、证监会将给予特别关注：……（七）

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[4] 美国司法部反垄断局认为，相比实施业务公开招揽禁令的市场，解除禁令的市场中客户与审计师之间的关系能更充分的反映审计服务、收费相关的信息（Chaney, Jeter and Shaw, 1997）。

[5] 在各种利益的驱动下，出现了一些会计师事务所为了争揽业务，竞相压低审计收费的不正常情况。如有的上市公司年销售额很大，在全国各地有分支机构数十家，但年报审计费却只有十来万元。在收费七折八扣的同时，执业质量也大打折扣，甚至连最基本的审计程序也不履行。更有甚者，有家事务所根本没有去一家上市公司作外勤审计，只是在审查了客户送达的材料后，便出具了无保留意见的审计报告（中国证监会，1998）。

收费异常的……”。但是，证监会和财政部等部门监管的效果受制于审计收费信息的可获得性，正是因为长期以来我国审计收费信息不公开，使得对会计师事务所恶意减少审计程序、削减审计成本的监管难以奏效。由于监管的不力，会计师事务所自然存在巨大的审计成本的压缩空间，指派低级审计人员或者减少审计时间等进而压缩成本是一种非常便利的行为，这样，会计师事务所的生存和盈利的关键就在于获得客户，因此竞相压价、“低价揽客”自然成为此种环境下会计师事务所的最佳对策，最终，使得我国审计市场中审计收费过低、“低价揽客”现象长期存在(李爽、吴溪，2002)。

不过，2001年12月24日证监会发布的“6号通知”显著改变了会计师事务所博弈的环境。根据规定，上市公司自2001年开始必须披露其支付给会计师事务所的审计及相关服务的费用信息，该项规定旨在便利于投资者考察会计师事务所的独立性和遵守职业道德的情况，降低市场参与者的信息不对称程度，从而提高审计质量(中国证监会，2001)。无疑的，审计收费信息的公开将对审计环境产生影响，从而改变会计师事务所的博弈策略。审计收费信息公开之后，监管部门将能更及时、准确地识别出审计收费过低的上市公司/会计师事务所，从而对其是否由此恶意减少审计程序和削减审计成本进行深入全面的检查，其监管的效果和效率将大大增强。由于压缩审计成本的空间受到极大制约，会计师事务所自然不得不提高其审计收费的报价，否则客户的获得不仅没有带来利润而且导致亏损，即出现“做得越多亏得越大”的状况，这样，会计师事务所通过压低审计收费争揽客户的行为将得到遏制。同时，作为审计服务接受者的上市公司也可能提高审计收费的水平，以规避过低的审计收费所带来的更多监管和更多置疑。

此外，审计收费信息的公开可以改善会计师事务所的信息环境，进而使得长期过低的审计收费得以恢复正常。当审计收费尚未公开披露之前，受限于信息渠道以及信息搜寻激励的障碍，会计师事务所很难清楚地了解其他会计师事务所和其他上市公司的审计收费情况，谈判能力和信息的双重缺乏导致过低审计收费长期存在。随着审计收费信息的强制披露，现任注册会计师、其他注册会计师和上市公司等审计市场的参与者之间信息不对称程度显著下降，各方将可以便利地了解到各个上市公司的审计费用情况，从而有助于各方判断现存审计业务关系的合理性，随之，会计师事务所可以据此与上市公司进行收费谈判，而独立审计准则[6]和会计准则[7]呈现逐年完善的趋势以及法律责任的渐趋增加，则给予会计师事务所提高审计收费充分的理由，这样将使得长期偏低的审计收费渐趋恢复正常。

相反，对于上一年度支付过高审计费用的上市公司，其更可能的策略和结果是削减审计费用。当审计收费尚未公开披露之前，上市公司很难清楚了解其他会计师事务所和其他公司的审计费用情况，当然也无从判断现任审计收费是否合理。同时，其他注册会计师也很难向上市公司提出有效的审计要约，从而降低了审计师变更的概率，使得上市公司与审计师之间的不匹配情况(Chaney, Jeter, and Shaw, 1997;

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[6] 1996年1月1日，第一批9个审计准则和1个实务公告颁布，1997年1月1日，第二批8个具体准则和3个实务公告颁布，1997年7月1日，第三批9个具体准则和2个实务公告颁布，2001年1月21日，第四批1 个具体准则和2个实务公告颁布，2002年9月30日，第五批2个具体准则和1个实务公告颁布。

[7] 2000 年年底，财政部颁布《企业会计制度》，2001年1月1日开始在股份有限公司施行。

Shu, 2000）长期存在。这样，可能导致该上市公司长期支付了过高的审计收费。随着审计收费信息的强制披露，该上市公司可以根据其他上市公司和注册会计师的审计收费情况与现任注册会计师进行收费谈判，[8]同时，其他注册会计师也可以有针对性的向潜在客户提出竞争性要约，从而改善上市公司与审计师之间的匹配度，使得长期趋高的审计收费渐趋下降。

综上，我得到如下假说：

假说一 在其他条件一定的情况下，审计收费信息的披露缩小上市公司支付的审计收费之间的差异程度，换言之，上市公司上期审计收费越高本期审计收费增加幅度越小。

不过，上述审计收费信息强制披露的影响在不同类型的会计师事务所之间可能存在差异。不同类型的上市公司对审计质量存在差异化的需求，具体的说，长期以来我国证券市场和审计市场的建立和管理很大程度上受到政府的影响，我国大部分上市公司仅仅满足于低层次的法定审计需求（DeFond *et al.*, 2000）。随着法律环境的改善和市场力量的增强，部分承受较多市场压力的公司可能产生对高质量审计的需求（陈冬华、周春泉，2006）。选择国际"五大"会计师事务所（以下简称"外资所"）的上市公司，通常愿意支付更高的审计费用，相反，选择国内会计师事务所（以下简称"内资所"）的公司，通常关注审计费用的节约（陈冬华、周春泉，2006）。而且，相比内资所，外资所通常具有更高的双边垄断能力，审计客户以变更手段要挟事务所降低收费的效力显著下降，因为事务所的变更，尤其是由外资所变更为内资所，通常被认为是客户风险异常或者审计质量下降的征兆（Shu, 200；蔡祥，2003），这会导致市场对企业价值的负面评价。此外，具体到内资所和外资所，我国监管部门对内资所和外资所的收费实行区别管理（《经济观察报》2004年10月30日）。外资所允许根据其审计成本和风险制定较高的收费价格，而且由于其国际声誉，收费也得到了市场的认可和接受。相反，内资所的审计收费则受到政府管制，由国家物价管理部门授权中国注册会计师协会制定行业的审计收费标准，以指导事务所的收费行为，[9]而且实际当中，仍有地方政府和单位出台各种规定，压低内资所的审计收费。[10]由此，在研究当中我进一步区分外资所和内资所，以考察审计收费信息强制披露规定对其审计收费变动的影响。

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8 例如烟台万华(600309) 2001年年报披露"公司支付 2001年度审计机构审计费用履行了以下程序：(1)、公司在最大范围内对我国上市公司普遍的审计费用进行了了解，特别是对山东省各上市公司的审计费用进行了比较；(2)、公司在对山东乾聚有限责任会计师事务所以前年度的审计工作情况以及该所的内部规范控制和业务发展情况进行了充分了解后，根据公司董事会和股东大会的聘用决定，与该所签定了"审计业务约定书"。在约定书中确定了支付该所的年度审计费用。"深南电(000037) 2004 年报披露"公司根据深圳市财政局深财字(1995)第38号文《会计师事务所业务收费标准暂行规定》以及公司年度资产总额情况，并参照规模相当的其他上市公司的审计费用支付情况，在报经董事会和股东大会通过后决定会计师的审计报酬。"

9 1999年的2255号文件《中介服务收费管理办法》中第六条(三)规定：对检验、鉴定、公证、仲裁收费等少数具有行业和技术垄断的中介服务收费实行政府定价。国内定价一般依据两个标准：即根据被审单位的资产总额或者依据注册会计师的工作小时。

10 具体参见《经济观察报》2004年10月30日的报道。

三、研究设计与数据来源

1·研究设计

本文考察的是审计收费信息强制披露对上市公司审计收费变动的影响，而影响审计收费的影响众多，为了控制会计准则、公司特征等因素的影响，我借鉴陈杰平、苏锡嘉、吴溪(2005)的作法，采用异常审计收费变动作为审计收费变动变量。[11]具体的，首先根据如下审计收费模型分年度估算出各个公司各年的异常审计费用：

$$\begin{aligned} LnFEE_t = {} & \alpha_1 + \beta_1 \times InASSET_t + \beta_2 \times INVREC_t + \beta_3 \times CURRENT_t \\ & + \beta_4 \times LEV_t + \beta_5 \times ACIDR_t + \beta_6 \times ROA_t + \beta_7 \times OPINION_t \\ & + \beta_8 \times LOCALCPA_t + \varepsilon_t \end{aligned} \quad (1)[12]$$

其中：$lnFEE_t$，当年审计收费(取自然对数)；$lnASSET_t$，当年资产总额(取自然对数)；$INVREC_t$，当年应收账款与存货之和占资产的比重；$CURRENT_t$，当年流动资产/资产；LEV_t，当年资产负债率；$ACIDR_t$，当年流动资产/流动负债；ROA_t，当年营业利润/资产；$OPINION_t$为哑变量，当年被出具标准无保留意见为0，否则为1；$LOCALCPA_t$为哑变量，当年聘任的审计师为外资所的，取值为0，否则为1。

式(1)中，残差项即为公司的异常审计费用$ABNFEE_t$，然后通过计算公司前后两期的异常审计费用的差异以反映异常审计费用变动，$\Delta ABNFEE_t = \varepsilon_t - \varepsilon_{t-1}$

同时，我借鉴伍利娜(2003)的审计费用变动模型建立如下回归模型以检验审计收费信息强制披露对异常审计费用变动的影响：

$$\begin{aligned} \Delta ABNFEE = {} & \alpha_1 + \beta_1 \times \Delta InASSET_1 + \beta_2 \times \Delta INVREC_t + \beta_3 \times \Delta LEV_t \\ & + \beta_4 \times \Delta ROA_t + \beta_5 \times LOSS_t + \beta_6 \times DUAL_t \\ & + \beta_7 \times SWITCH_t + \beta_8 \times IMPROVE_t \\ & + \beta_9 \times LOCALCPA_t + \beta_{10} \times RANK_t + \varepsilon_t \end{aligned} \quad (2)$$

其中：$\Delta ASSET_t$，当年资产总额(取自然对数)与上一年资产总额之差；$\Delta INVREC_t$，当年应收账款与存货之和占资产的比重与上一年对应比重之差；ΔLEV_t，当年资产负债率与上一年资产负债率之差；ΔROA_t，当年资产报酬率与上一年资产报酬率之差；$LOSS_t$为哑变量，当年发生净亏损，取值为1，否则为0；$DUAL_t$为哑变量，如果同时发行A/H股，取值为1，否则为0；$SWITCH_t$为哑变量，当年发生审计师变更的，取值为1，否则为0；$IMPROVE_t$为审计意见改善哑变量，借鉴陈杰平、苏锡嘉、吴溪(2005)的作法，如果当年审计意见类型相比上一年审计意见类型改善，即(从否定/无法表示意见到其他，从保留意见到无保留/无保留＋说明，从无保留＋说明到无保留)，取值为1，否则为0；$LOCALCPA_t$为哑变量，当年聘任的审计师为外资所的，取值为0，否则为1；$RANK_t$审计费用相对水平，根据

[11] 采用审计收费模型估算出异常审计收费，进而利用异常审计收费变动考察审计收费信息披露的经济后果，上述研究设计得益于审稿人的建议，在此，特别感谢。

[12] 出于简化的目的，变量中省略i。

上一年度异常审计收费$ABNFEE_t$排序(10分位数)，依次取值为0，1，2，3，4，至9，然后除以9，该数值越小，意味着该公司审计费用水平在全体上市公司当中排名越低。

2 · 数据来源与描述性统计

本文考察的是审计收费信息强制披露对异常审计收费变动的影响，因此研究样本必须同时具备2001年和2002年审计收费的信息，同时，我根据以下条件加以选择：(1)发行A股或者同时发行A股与B股的上市公司；(2)不属于金融行业的上市公司(剔除6家属于银行、信托行业的金融公司)；(3)相关财务数据披露完全。按照如上程序共得到752家上市公司数据。此外，我还搜集了上市公司2000年审计收费数据，有612个数据可以直接来自上市公司2001年年报，另外140家上市公司没有披露2000年审计收费信息，我直接用其2001年的审计收费作为代替。[13]

上市公司审计收费数据和会计师事务所的信息来源于上市公司披露的年度报告，公司财务数据和市场交易数据均取自香港理工大学和深圳国泰安公司联合开发的《中国上市公司财务报表数据库》和《中国上市公司股票交易数据库(CSMAR2005版本)》。

表1显示，总体上2001和2002年我国上市公司支付的审计费用额呈现上升的趋势，平均增加41166.18元，最高增加了2780000元(华能国际600011)，这与我国独立审计准则和会计准则逐渐完善相一致，更完善的审计准则和会计准则要求注册会计师投入更多的努力和时间，自然审计收费也随之上涨。

表1 相关变量描述性统计

变量名	样本数	均值	标准差	最小值	最大值	百分位数		
						25%	50%	75%
ΔFEE_t	1504	41166.180	212998.450	-2000000.000	2780000.000	0.000	0.000	70000.000
$\Delta ABNFEE_t$	1503	0.000	0.255	-1.610	1.720	-0.091	-0.006	0.066
$DUAL_t$	1504	0.120	0.320	0.000	1.000	0.000	0.000	0.000
$IMPROVE_t$	1504	0.080	0.275	0.000	1.000	0.000	0.000	0.000
$\Delta\ lnASSET_t$	1504	0.072	0.259	-2.940	1.370	-0.021	0.062	0.177
$\Delta INVREC_t$	1504	-0.013	0.087	-0.693	0.591	-0.043	-0.008	0.019
ΔLEV_t	1503	0.044	0.391	-3.037	9.994	-0.023	0.017	0.068
ΔROA_t	1504	-0.029	0.399	-10.007	4.028	-0.029	-0.007	0.006
$LOSS_t$	1503	0.130	0.338	0.000	1.000	0.000	0.000	0.000
$SWITCH_t$	1504	0.160	0.366	0.000	1.000	0.000	0.000	0.000
$LOCALCPA_t$	1504	0.890	0.313	0.000	1.000	1.000	1.000	1.000

注：ΔFEE_t，当年审计收费与上一年审计收费之差(单位：元)

[13] 采用2001年的审计收费作为其2000年审计收费的替代，主要考虑到比较样本的一致性，以减少样本不一致对结果的影响。在稳健检验中，我剔除该140家公司重新进行检验。

如表2－表4所示，我考察了审计收费信息强制披露对审计收费变动趋势的影响，同时区分内资会计师事务所和外资会计师事务所等不同审计市场分别加以考察。从表2看，上一年度异常审计收费越低的公司，随后年度异常审计收费依然越低，但是审计收费增加的幅度却明显高于上一年度审计收费高的公司，这意味着审计收费信息强制披露之后，那些收取过低审计费用的注册会计师其状况得到明显改善，其与高审计收费的注册会计师之间的审计收费差异得到一定程度的缩小。进一步在划分内资会计师事务所和外资会计师事务所市场之后，上述趋势依然存在。

表2 2001和2002年异常审计收费及其变动比较

按照2001年异常	2001年		2002年		差异	
审计收费排序	均值	中位数	均值	中位数	均值	中位数
1	-0.738	-0.695	-0.498	-0.550	0.240	0.129
2	-0.442	-0.443	-0.306	-0.381	0.136	0.022
3	-0.277	-0.276	-0.223	-0.235	0.054	0.006
4	-0.152	-0.150	-0.123	-0.169	0.030	-0.013
5	-0.056	-0.055	0.005	-0.090	0.061	-0.030
6	0.045	0.044	0.060	-0.004	0.014	-0.041
7	0.155	0.157	0.074	0.059	-0.081	-0.085
8	0.274	0.270	0.238	0.198	-0.036	-0.060
9	0.414	0.408	0.240	0.307	-0.175	-0.114
10	0.758	0.668	0.522	0.478	-0.236	-0.160
t检验[b]	33.930***		16.732***		-8.520***	
Mann-Whitney检验[b]		-23.733***		-16.090***		-8.007***

注： 2001年异常审计收费为最低的10%取值为1，最低的20%取值为2，其他依次取值；b列示的是2001年异常审计收费排名后50%（1－5组）与前50%（6－10组）的差异检验结果。

表3 2001和2002年异常审计收费及其变动比较－内资所

按照2001年异常	2001年		2002年		差异	
审计收费排序	均值	中位数	均值	中位数	均值	中位数
1	-0.743	-0.695	-0.493	-0.542	0.250	0.154
2	-0.445	-0.448	-0.309	-0.392	0.136	0.012
3	-0.276	-0.273	-0.223	-0.232	0.053	0.013
4	-0.152	-0.150	-0.120	-0.173	0.032	-0.020
5	-0.057	-0.056	0.010	-0.082	0.066	-0.020
6	0.046	0.044	0.064	-0.002	0.018	-0.041
7	0.155	0.156	0.066	0.053	-0.088	-0.085
8	0.274	0.270	0.250	0.221	-0.024	-0.055
9	0.417	0.408	0.250	0.315	-0.167	-0.111
10	0.712	0.650	0.446	0.440	-0.266	-0.183
t检验[b]	32.512***		15.435***		-7.944***	
Mann-Whitney检验[b]		-22.465***		-14.934***		-7.220***

注：2001年异常审计收费为最低的10%取值为1，最低的20%取值为2，其他依次取值；b列示的是2001年异常审计收费排名后50%（1－5组）与前50%（6－10组）的差异检验结果。

表4 2001和2002年异常审计收费及其变动比较－外资所

按照2001年异常	2001年		2002年		差异	
审计收费排序	均值	中位数	均值	中位数	均值	中位数
1	-0.720	-0.685	-0.631	-0.550	0.129	0.129
2	-0.425	-0.406	-0.331	-0.381	0.071	0.022
3	-0.280	-0.296	-0.301	-0.235	-0.005	0.006
4	-0.152	-0.155	-0.165	-0.169	-0.010	-0.013
5	-0.035	-0.035	-0.153	-0.090	-0.119	-0.030
6	0.023	0.023	-0.103	-0.004	-0.126	-0.041
7	0.160	0.173	0.093	0.059	-0.103	-0.085
8	0.267	0.270	0.040	0.198	-0.224	-0.060
9	0.390	0.377	0.143	0.307	-0.238	-0.114
10	0.944	0.773	0.736	0.478	-0.096	-0.160
t检验[b]	11.977***		6.473***		-3.143***	
Mann-Whitney检验[b]		-7.535***		-5.799***		-3.665***

注： 2001年异常审计收费为最低的10%取值为1，最低的20%取值为2，其他依次取值；b列示的是2001年异常审计收费排名后50%（1－5组）与前50%（6－10组）的差异检验结果。

此外，从表3和表4我发现，内资所2001年审计收费最低组（1）和最高组（10）异常审计收费变动之差为0.516（0.25-(-0.266)），外资所最低组与最高组的异常审计收费变动差异则为0.225(0.129-(-0.096))，前者是后者的2.29倍，这说明在内资所市场中（聘请内资所的上市公司）审计收费的弹性显著高于外资所市场，在审计收费信息披露之后，内资所中过低审计收费提升的幅度高于外资所，同时，过高审计收费下降的幅度也显著高于外资所。

对于上述结果一个竞争性假说是，审计市场审计收费均值回复导致了审计收费差异的缩小。过高的审计收费不太可能持续的增加，而过低的审计收费也不太可能持续的降低，这样自然可能出现审计市场当中一定时间内审计收费差异的缩小。在首次披露审计收费的2001年，部分公司同时披露了其2000年的审计费用情况，上市公司不太可能变更已经支付或者已经约定的以前年度的审计费用，换言之，2001年和2000年的审计费用是在信息公布之前已经制定的，它们及其变动不会受到“6号通知”的影响，这为检验该竞争性假说提供了难得的契机。如果审计收费差异缩小的原因在于审计市场审计收费均值回复，那么不难预见上述关系也将在首次披露审计收费信息的2001年度成立。反之，如果上述现象在2001年度不存在，那么就有理由相信审计收费差异的缩小趋势主要得益于审计收费信息的强制披露。以下，我选取2001年度的审计收费数据进行差异的比较，结果列于表5－7。

从表5看，上市公司审计收费变动依然呈现与上一年度审计收费水平显著负相关的特征，不过其差异幅度明显低于2002年的变动情况。在剔除掉以2001年审计费用代替2000年审计费用的140家公司之后，结果与表5基本一致。同时，我进一步划分内资所和外资所考察其审计收费的变动情况，结果见表6和表7。从表6和表7看，内资所2000年审计收费最低组（1）和最高组（10）异常审计收费变动之差为0.068

(0.023-(-0.045)),外资所最低组与最高组的异常审计收费变动差异则为0.069(0.046-(-0.023)),这说明在审计收费强制披露之前,内资所市场与外资所市场的审计收费变动并不存在显著差异。

表5 2000和2001年异常审计收费及其变动比较

按照2000年异常	2000年		2001年		差异	
审计收费排序	均值	中位数	均值	中位数	均值	中位数
1	-0.743	-0.679	-0.716	-0.691	0.028	0.019
2	-0.452	-0.446	-0.439	-0.423	0.013	0.015
3	-0.282	-0.277	-0.259	-0.250	0.023	0.024
4	-0.155	-0.148	-0.155	-0.142	0.000	0.017
5	-0.056	-0.053	-0.046	-0.042	0.010	0.021
6	0.044	0.035	0.038	0.042	-0.005	0.008
7	0.148	0.151	0.146	0.157	-0.002	0.003
8	0.270	0.272	0.262	0.263	-0.008	-0.006
9	0.433	0.432	0.417	0.408	-0.017	-0.006
10	0.774	0.692	0.734	0.661	-0.040	-0.022
t检验[b]	33.836***		31.410***		-4.161***	
Mann-Whitney检验[b]		-23.733***		-22.796***		-4.729***

注: 2000年异常审计收费为最低的10%取值为1,最低的20%取值为2,其他依次取值;b列示的是2000年异常审计收费排名后50%(1—5组)与前50%(6—10组)的差异检验结果。

表6 2000和2001年异常审计收费及其变动比较—内资所

按照2001年异常	2000年		2001年		差异	
审计收费排序	均值	中位数	均值	中位数	均值	中位数
1	-0.745	-0.676	-0.722	-0.690	0.023	0.019
2	-0.452	-0.446	-0.438	-0.422	0.014	0.017
3	-0.278	-0.274	-0.252	-0.241	0.026	0.025
4	-0.155	-0.146	-0.152	-0.138	0.003	0.018
5	-0.055	-0.053	-0.043	-0.042	0.013	0.021
6	0.044	0.035	0.033	0.039	-0.010	0.005
7	0.148	0.151	0.148	0.157	-0.001	0.002
8	0.269	0.272	0.263	0.264	-0.006	-0.004
9	0.436	0.433	0.419	0.408	-0.016	-0.001
10	0.721	0.652	0.675	0.642	-0.045	-0.030
t检验[b]	32.339***		29.403***		-4.017***	
Mann-Whitney检验[b]		-22.298***		-21.262***		-4.626***

注: 2001年异常审计收费为最低的10%取值为1,最低的20%取值为2,其他依次取值;b列示的是2001年异常审计收费排名后50%(1—5组)与前50%(6—10组)的差异检验结果。

表7 2000和2001年异常审计收费及其变动比较－外资所

按照2001年异常	2000年		2001年		差异	
审计收费排序	均值	中位数	均值	中位数	均值	中位数
1	-0.738	-0.706	-0.692	-0.691	0.046	0.019
2	-0.451	-0.438	-0.443	-0.449	0.008	0.011
3	-0.306	-0.293	-0.309	-0.338	-0.002	-0.015
4	-0.160	-0.161	-0.200	-0.177	-0.040	0.000
5	-0.059	-0.055	-0.101	-0.072	-0.042	-0.015
6	0.042	0.041	0.095	0.136	0.052	0.048
7	0.144	0.143	0.132	0.137	-0.012	0.018
8	0.288	0.301	0.239	0.206	-0.049	-0.054
9	0.418	0.413	0.397	0.377	-0.021	-0.024
10	0.974	0.827	0.952	0.806	-0.023	-0.018
t检验b	12.217***		12.344***		-1.144	
Mann-Whitney检验[b]		-8.059***		-8.034***		-1.343

注： 2001年异常审计收费为最低的10%取值为1，最低的20%取值为2，其他依次取值；b列示的是2001年异常审计收费排名后50%（1－5组）与前50%（6－10组）的差异检验结果。

四 · 实证结果与分析

1 · 基本实证结果与分析

表8中2002年相对2001年部分列示的是2002年上市公司异常审计收费变动的回归结果，从全部样本的回归结果看，在控制了影响审计收费变动的相关因素之后，解释变量$RANK_t$回归系数显著为负，上一年度异常审计收费低的公司在2002年审计收费的增长幅度显著高于上一年度审计收费高的公司，这说明审计收费信息的强制披露的确改善了我国审计市场收费的不良状况，使得审计收费的极端状况得以缓解。进一步区分内资所和外资所进行研究，我依然发现$RANK_t$回归系数显著为负，这意味着，无论是谈判能力较强的外资所市场还是谈判能力较弱的内资所市场都从信息的强制披露中得益，使得过低的审计收费得以上升，而过高的审计收费得以下降或者更小幅度的上升。此外，我发现，资产和资产负债率的增加显著降低了异常审计收费的增加，而应收账款与存货比重的增加与异常审计收费变动正相关。

问题是，上述异常审计收费变动与$RANK_t$的负相关关系是得益于审计收费信息的强制披露，还是审计市场审计收费均值回复的结果？如果部分原因在于审计市场审计收费均值回复，那么不难预见上述关系也将在首次披露审计收费信息的2001年度成立。反之，如果上述关系在2001年度不存在，那么就有理由相信异常审计收费变动与$RANK_t$的负相关关系主要得益于审计收费信息的强制披露。因此，基于论文第二部分的理由我采用2001年的数据重新对模型（2）进行回归，结果见表8中2001年相对2000年栏。结果显示，其他控制变量的回归结果与基于2002年数据的结果基本一致，而$RANK_t$回归系数统计上不显著，审计费用均值回复的解释没有得到支持。

表8 审计收费信息披露与异常审计收费变动回归结果

变量名	2002年相对2001年			2001年相对2000年		
	全部样本	内资所	外资所	全部样本	内资所	外资所
常数项	0.144	0.191	0.118	0.035	0.042	0.022
	(3.289***)	(7.472***)	(1.523)	(5.190***)	(9.729***)	(2.442***)
$\Delta\ lnASSET_t$	-0.127	-0.094	-0.139	-0.294	-0.291	-0.292
	(-2.066**)	(-1.485)	(-0.450)	(-33.695***)	(-31.362***)	(-10.203***)
$\Delta INVREC_t$	0.272	0.262	0.030	0.108	0.098	0.193
	(1.590)	(1.486)	(0.047)	(5.472***)	(4.656***)	(2.688***)
ΔLEV_t	-0.091	-0.090	-0.123	-0.215	-0.212	-0.255
	(-2.3**)	(-2.275**)	(-0.174)	(-17.736***)	(-16.739***)	(-4.38***)
ΔROA_t	-0.039	-0.046	2.562	-0.045	-0.045	-0.096
	(-0.965)	(-1.140)	(2.433**)	(-3.547***)	(-3.490***)	(-0.750)
$LOSS_t$	0.022	0.029	0.212	-0.022	-0.024	0.011
	(0.575)	(0.727)	(1.207)	(-3.471***)	(-3.67***)	(0.53)
$DUAL_t$	0.089	0.109	0.040	-0.024	-0.025	-0.025
	(2.257**)	(2.361**)	(0.509)	(-3.748***)	(-3.184***)	(-2.570**)
$SWITCH_t$	0.052	0.036	-0.063	-0.001	-0.003	0.021
	(1.184)	(0.787)	(-0.347)	(-0.183)	(-0.559)	(1.87*)
$IMPROVE_t$	0.083	0.049	0.495	0.004	0.002	0.024
	(1.733*)	(1.006)	(1.987*)	(0.606)	(0.275)	(0.906)
$RANK_t$	-0.391	-0.395	-0.330	-0.007	-0.009	0.006
	(-10.597***)	(-9.966***)	(-3.121***)	(-1.218)	(-1.300)	(0.488)
$LOCALCPA_t$	0.046			0.006		
	(1.105)			(0.921)		
Adjusted R^2	0.149	0.145	0.288	0.710	0.703	0.795
F	14.146***	13.659***	4.454***	185.249***	175.023***	38.534***
N	751	673	78	751	663	88

()中为t值；*、**、***分别表示统计显著水平0.10、0.05、0.01

综合以上结果，假设一得到一定程度的支持，即审计收费信息的强制披露改善了我国审计市场，使得过低的审计收费得以更快的上升，而过高的审计收费得以下降或者更小幅度的上升，最终导致中国审计市场审计收费极端状况的不断缓解。

2·稳健检验

本研究中的关键变量 $ABNFEE_t$ 是基于审计收费模型加以估算的，虽然2000至2002年各个年度审计收费回归模型的拟和系数都达到37%以上，但其有效性依然可能对本文的发现产生影响。为此，考虑到异常审计收费的变动与实际审计收费变动之间高度、显著正相关(陈杰平、苏锡嘉、吴溪，2005)，我直接采用 $\Delta LnFEE_t$(当年审计收费的自然对数与上一年审计收费自然对数之差)作为异常审计收费变动重新对上述模型进行回归。结果见表9。

从表9看，依照2002年数据回归的结果中 $RANK_t$ 回归系数显著为负，这与表8结果一致。而在2001年数据的回归结果中，$RANK_t$ 回归系数却显著为正，这种效应主

要体现在内资所市场当中。这进一步证明2002年审计收费变动的趋势主要是信息披露的结果，而不是审计收费均值回归的结果。

鉴于上期审计收费水平$RANK_t$对审计收费变动$ABNFEE_t$的影响可能是非线性的，为此，我对审计收费变动变量进行哑变量处理——$ABFINCREASE_t$（异常审计收费上升为1，否则为0）采用logistic模型进行回归（回归模型中的解释变量与模型（2）完全相同），结果显示，在审计收费信息强制披露后的2002年，无论是内资所还是外资事务所还是全部样本，回归模型中$RANK_t$回归系数都显著为负，而上述现象在审计收费信息正式披露的2001年并不存在。

此外，考虑到同时发行B股或/和H股的上市公司其审计收费定价以及公司特徵可能区别于A股公司，我剔除了上述公司重新进行检验，结果显示，2002年中混合数据回归模型中的$RANK_t$回归系数依然显著为负，在划分为内资所和外资所之后，前者回归系数显著为负，而后者统计上不显著，而在2001年，无论是基于混合数据还是区分不同会计师事务所所作的回归，$RANK_t$回归系数统计上都不显著。

综合以上结果，可以初步判断，2001年开始正式实施的上市公司审计收费信息强制披露，一定程度上减少了投资者与管理层/审计师在审计收费上的信息不对称程度，在可能引致的股东指责以及监管层监管的压力下，过低的审计收费随之得以提升，而审计收费的上升自然有助于注册会计师投入更多的审计努力，进而提高审计质量，不过，上述推论尚需未来实证证据的检验。

五、进一步研究：异常审计收费损害了会计盈余价值相关性吗？

上述研究发现，随着2001年审计收费信息强制披露政策的实施，过低的审计收费随之得以提升，问题是，过低审计收费的缓解是否随之改善了审计质量，或者，更基础的，过低的审计收费是否损害了审计质量。基于此，以下研究异常审计收费与审计质量的关系，以进一步检验审计收费信息强制披露的政策效果。考虑到审计的作用在于提高会计盈余的可信性（DeAngelo, 1981），高质量的审计自然带来更高的会计盈余价值相关性（Teoh and Wong, 1993），自然，如果过低的异常审计收费真的会损害审计质量，那么不难预见，存在过低异常审计收费的公司，其会计盈余价值相关性应当更低。由此，我得到如下假说，以进一步检验异常审计收费对审计质量的影响：

假说二 在其他条件一定的情况下，存在异常审计收费的公司其会计收益价值相关性相对较低。

同时，考虑到过高的异常审计收费可能意味着上市公司对审计师的“意见购买”（陈杰平、苏锡嘉、吴溪，2005；Francis and Ke, 2006；方军雄和洪剑峭，2008），从而导致市场对其独立性的置疑，因此，在下文分析中将进一步划分异常审计收费为负和异常审计收费为正的样本检验异常审计收费对审计质量的影响。

考察会计盈余价值相关性，可以采取基于事件研究的会计盈余价值相关性模型和基于关联研究的会计盈余价值相关性模型，在下文具体研究当中，我采用基于关

表9 审计收费信息披露与审计收费变动回归结果－稳健检验

变量名	2002年相对2001年			2001年相对2000年		
	全部样本	内资所	外资所	全部样本	内资所	外资所
常数项	0.249	0.255	0.210	-0.039	-0.011	0.057
	(5.557***)	(9.839***)	(2.706***)	(-1.019)	(-0.444)	(0.910)
Δ $lnASSET_t$	0.224	0.269	0.134	0.038	0.057	-0.234
	(3.561***)	(4.192***)	(0.434)	(0.770)	(1.097)	(-1.185)
$\Delta INVREC_t$	0.203	0.175	-0.07	-0.213	-0.282	0.431
	(1.1590)	(0.981)	(-0.107)	(-1.904*)	(-2.405**)	(0.868)
ΔLEV_t	-0.008	-0.004	0.104	-0.151	-0.154	0.646
	(-0.207)	(-0.090)	(0.147)	(-2.198**)	(-2.183**)	(1.604)
ΔROA_t	-0.041	-0.048	2.474	-0.041	-0.050	1.409
	(-0.978)	(-1.159)	(2.339**)	(-0.582)	(-0.696)	(1.597)
$LOSS_t$	0.043	0.051	0.259	-0.038	-0.034	-0.071
	(1.093)	(1.274)	(1.467)	(-1.067)	(-0.923)	(-0.484)
$DUAL_t$	0.052	0.064	0.035	0.007	0.029	-0.068
	(1.287)	(1.371)	(0.436)	(0.182)	(0.649)	(-1.03)
$SWITCH_t$	-0.004	-0.044	0.127	-0.017	-0.028	0.082
	(-0.091)	(-0.969)	(0.700)	(-0.653)	(-1.031)	(1.045)
$IMPROVE_t$	0.040	-0.004	0.542	0.013	-0.006	0.043
	(0.814)	(-0.089)	(2.165**)	(0.339)	(-0.165)	(0.242)
$RANK_t$	-0.375	-0.372	-0.352	0.193	0.218	0.115
	(-9.948***)	(-9.271***)	(-3.316***)	(5.603***)	(5.767***)	(1.306)
$LOCALCPA_t$	0.006			0.042		
	(0.137)			(1.173)		
Adjusted R^2	0.122	0.129	0.298	0.053	0.066	0.000
F	11.449***	12.040***	4.640***	5.197***	6.219	1.001
N	751	673	78	751	663	88

()中为t值；*、**、***分别表示统计显著水平0.10、0.05、0.01

联研究的会计盈余价值相关性模型。基于关联研究的会计盈余价值相关性，将长视窗(通常为一个年度)内股票回报作为反映企业经济收益的替代变量，进而通过考察会计盈余与股票回报之间的相关性以检验会计盈余对经济收益的反映程度来衡量会计盈余的价值相关性。上述长视窗的设计可以有效避免基于事件研究的会计盈余价值相关性模型的限制，基于事件研究的会计盈余价值相关性必须假设投资者在盈余公告时知晓审计收费异常，而审计收费信息来自公司年报，这样，对于较早公布年报的企业来说，投资者事实上也无法知晓审计收费是否异常。同时考虑到，我国上市公司定期报告的年报除了披露会计盈余之外，通常还包括股利、资产重组、管理层变更等其他影响股价的重大信息，这使得基于事件研究的设计很难精确的度量会计盈余对股价的影响(俞乔和程滢，1996)。这样，基于关联研究的会计盈余价值相关性研究设计可能是较为恰当的设计，而且会计盈余价值相关性并不必然与会计盈余信息含量相矛盾(Subramanyam, 1996)。因此，我采取如下基于关联研究的会计盈

余价值相关性模型以检验假说二：

$$RET_t = \alpha_i + \beta_1 \times E/P_t + \beta_2 \times P/B_t + \beta_3 \times LEV_t + \beta_4 \times OPINION_t + \beta_5 \times LnMV_t + \beta_6 \times LOCALCPA_t + \beta_7 \times ABNFEE_t + \beta_8 \times E/P_t \times P/B_i + \beta_9 \times E/P_t \times LEV_I + \beta_{10} \times E/P_t \times OPINION_I + \beta_{11} \times E/P_t \times LnMV_I + \beta_{12} \times E/P_t \times LOCALCPA_I + \beta_{13} \times E/P_t \times ABNFEE_t + \varepsilon_t \quad (3)$$

其中，因变量RET_t，即公司i按照从t年4月份最后一个交易日至$t+1$年4月份最后一个交易日计算的股票市场回报率，同时考虑配股增发等因素并进行了除权处理；E/P_t，表示公司i在t年的净利润/总市值，其中，总市值根据公司报告当年t年末总股本和t－1年4月份最后一个交易日的收盘价计算；P/B_t为公司i在t年年末股东权益的账面价值与t年4月份最后一个交易日计算的个股总市值计算而得；LEV_t为根据公司i在t年年末总负债和总资产的账面价值计算的资产负债率；$OPINION_t$为哑变量，如果当年审计意见为标准无保留审计意见，取值为0，否则为1；$LnMV_t$公司规模，$t-1$年最后一个交易日计算的个股总市值的自然对数；$LOCALCPA_t$为哑变量，当年聘任的审计师为外资所的，取值为0，否则为1；$ABNFEE_t$异常审计收费。

考虑到控制变量与会计盈余价值相关性之间可能的非线性关系，我借鉴Teoh and Wong（1993）的作法对连续变量P/B_t、LEV_t、$LnMV_t$采用哑变量的设计处理。具体的，当上述变量值高于中位数时取1。此外，$ABNFEE_t$异常审计收费分别采取连续变量和非连续变量（即上文的$RANK_t$）两种设计。考虑到审计收费信息披露之后，监管层能够便利对过低审计收费的公司/会计师事务所进行重点监管，从而缓解过低审计收费的负面影响。因此，我选择审计收费强制披露的第一年——2001年和前一年——2000年的数据作为研究样本以消除监管对异常审计收费负面效应的影响。[14]

表10列示的是对$ABNFEE_t$采用连续变量设计的回归结果，在全部样本回归模型当中，交叉项$E/P_t \times ABNFEE_t$回归系数统计上并不显著，但是在区分了正负异常审计收费样本之后，我发现，在异常审计收费为负（即过低审计收费）的回归模型当中，交叉项$E/P_t \times ABNFEE_t$回归系数显著为正，这意味着对于收取过低审计收费的注册会计师来说过低的审计收费的确影响了其审计努力的水平，进而损害了会计盈余价值相关性。不过，在异常审计收费为正的样本中，交叉项$E/P_t \times ABNFEE_t$回归系数虽然为负但统计上并不显著，因此，就2000－2001年样本来说，我没有发现异常审计收费损害了审计独立性进而损害会计盈余价值相关性的证据。在对$ABNFEE_t$采用非连续变量设计之后，回归结果（表11）与表10基本一致，不过，统计上的显著性下降。上述结果与方军雄和洪剑峭（2008）的发现不一致，可能原因在于两者设计的差异，方军雄和洪剑峭（2008）采用审计收费变动作为异常审计收费的衡量指标，而且没有区分异常审计收费为正的情况和为负的情况。

[14] 在审计披露的第一年——2001年，当监管层知晓审计收费之时上市公司的审计已经完成，监管层已无法据此对会计师事务所加以有效监管。

表10 异常审计费用与会计盈余价值相关性回归结果－基于$ABNFEE_t$

	全部样本		$ABNFEE_t$为负的样本		$ABNFEE_t$为正的样本	
变量名	参数估计值	t值	参数估计值	t值	参数估计值	t值
常数项	0.037	0.506	-0.103	-0.944	0.066	0.566
E/P_i	10.962	4.373***	18.197	4.680***	7.864	2.138**
P/B_t	0.091	2.661***	0.123	2.617***	0.096	1.851*
LEV_t	0.083	2.171**	0.175	3.279***	0.005	0.087
$OPINION_t$	0.066	2.224**	0.052	1.245	0.102	2.402**
$LnMV_t$	-0.196	-5.623***	-0.198	-4.056***	-0.175	-3.381***
$LOCALCPA_t$	0.066	1.011	0.113	1.208	0.042	0.438
$ABNFEE_t$	0.041	1.040	-0.038	-0.428	0.107	1.073
$E/P_t \times P/B_i$	2.086	2.129**	-1.744	-1.101	3.998	2.623***
$E/P_t \times LEV_i$	-5.421	-4.030***	-7.037	-3.665***	-3.658	-1.890*
$E/P_t \times OPINION_i$	-5.224	-4.884***	-1.701	-0.919	-5.249	-3.576***
$E/P_t \times LnMV_i$	1.097	1.174	-0.626	-0.422	2.168	1.504
$E/P_t \times LOCALCPA$	-0.748	-0.320	-2.765	-0.771	-0.155	-0.048
$E/P_t \times ABNFEE_t$	0.728	0.757	4.378	1.667*	-0.744	-0.248
Adjusted R^2	0.101		0.135		0.083	
F	12.375***		9.030***		5.465***	
N	1317		671		646	

*、**、***分别表示统计显著水平0.10、0.05、0.01

表11 异常审计费用与会计盈余价值相关性回归结果－基于$RANK_t$

	全部样本		$ABNFEE_t$为负的样本		$ABNFEE_t$为正的样本	
变量名	参数估计值	t值	参数估计值	t值	参数估计值	t值
常数项	0.014	0.185	-0.076	-0.725	0.025	0.148
E/P_i	10.759	4.112***	15.307	3.853***	9.578	1.915*
P/B_t	0.091	2.662***	0.121	2.571***	0.094	1.807*
LEV_t	0.082	2.157**	0.173	3.228***	0.006	0.109
$OPINION_t$	0.066	2.214**	0.053	1.27	0.101	2.357**
$LnMV_t$	-0.195	-5.591***	-0.195	-4.017***	-0.175	-3.371***
$LOCALCPA_t$	0.067	1.022	0.121	1.294	0.033	0.343
$RANK_t$	0.044	0.855	-0.084	-0.549	0.109	0.673
$E/P_t \times P/B_i$	2.064	2.104**	-1.618	-1.023	4.22	2.627***
$E/P_t \times LEV_i$	-5.422	-4.029***	-6.901	-3.592***	-3.79	-1.96**
$E/P_t \times OPINION_i$	-5.225	-4.88***	-1.594	-0.848	-5.233	-3.563***
$E/P_t \times LnMV_i$	1.046	1.123	-0.796	-0.549	2.363	1.581
$E/P_t \times LOCALCPA$	-0.908	-0.39	-3.256	-0.906	-0.362	-0.114
$E/P_t \times RANK_t$	0.728	0.565	7.682	1.605	-2.406	-0.511
Adjusted R^2	0.100		0.135		0.082	
F	12.298***		9.012***		5.409***	
N	1317		671		646	

*、**、***分别表示统计显著水平0.10、0.05、0.01

六、研究结论

本文以2001年开始实施的上市公司审计收费信息强制披露制度为切入点考察了信息披露管制的经济后果。具体的，我考察审计收费强制披露是否改善了中国审计市场的审计收费状况，是否有助于缓解中国审计市场审计收费的极端情况，随后，我进一步考察异常审计收费对审计质量的影响。结果发现，2002年审计收费的变动与其上期审计收费的高低显著负相关，这意味着过低/过高审计收费的极端状况在审计收费信息强制披露之后有所改善，而上述现象在审计收费首次披露的2001年度并不明显。而且，实证证据表明，过低的审计收费一定程度损害了审计质量。总体上，本研究支持审计收费强制披露改善了审计环境的结论。

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The Economic Consequences of the Regulation on Audit Fee Disclosure – Evidence from China's Audit Market[1]

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Abstract

The regulation on audit fee disclosure that became effective for public companies in 2001 was designed to reduce the information asymmetry between companies and investors and consequently to improve China's audit environment. This paper tests the effectiveness of this regulation. The results show that the difference in audit fees between companies decreased after the policy was implemented, and that an unreasonably low audit fee damages audit quality. Therefore, in general the disclosure of audit fees has improved the audit environment in China.

Keywords: Audit Fee, Information Disclosure, Economic Consequence, Institutional Environment
CLC codes: F239, F275

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I. Introduction

For a long time, China's audit market had been overly competitive, and this vicious competition without appropriate regulation resulted in unreasonable reductions of audit fees and a deterioration of audit quality (Li and Wu, 2002; Xia and Lin, 2003). To improve corporate governance and reduce information asymmetry between stockholders and management or the auditor, the China Securities Regulatory Commission (CSRC) promulgated the *6th Notice on Q&A about Standards of Information Disclosure by Companies Offering Securities to the Public* (hereafter the "6th Notice"), which required public companies to disclose audit and related services fees starting from 2001. But whether this regulation of audit fee disclosure has worsened competition in China's audit market or improved the audit market structure has become the focus of recent debate. The opinion of policy makers is that employing the auditor and knowing the service fee is the stockholders' right; moreover, audit fee disclosure helps in reviewing the independence and professional ethics of an auditor, thereby decreasing information asymmetry and improving audit quality (CSRC, 2001). But academia has not agreed with the policy makers. In the opinion of scholars, the effectiveness of the regulation on information disclosure depends on the institutional environment, and inappropriate regulation may damage social welfare (Stigler, 1964; Wu, Hu, Wu, and Rui, 2005).[3] Currently, China's audit market is in its primary stages, which has resulted in intense and cruel competition between auditors when bidding for listed companies. In such an institutional environment, the auditor's bargaining power may worsen with the disclosure of audit fee information, leading to a continuous decrease in audit fees and audit independence. As a result, the auditor might cut audit costs by replacing more highly skilled CPAs with those of lesser skill, or by reducing the input of work time.

Considering the above, this paper studies the effect on China's audit market of the regulation on disclosing audit fee information that took effect in 2001. First, I observe the change in audit fees in 2002, the year subsequent to the announcement of the 6th Notice, and find that this change is negatively correlated with the previous-period audit fee. But this phenomenon does not exist in 2001, suggesting that the extremeness of the audit fees weakened after the policy was implemented. Then I study whether abnormal audit fees damage audit quality and find that unreasonably low audit fees have some negative effect on audit quality. In general, the paper supports the conclusion that the disclosure of audit fee information has been helpful in improving the audit environment.

This paper makes two contributions as follows. First, despite the continuous attention of researchers to the regulation of information disclosure, many issues are

[3] Stigler (1964) finds that American regulation of special purpose entities (SPEs) in the 20th century damaged the efficacy of the capital market; Wu, Hu, Wu, and Rui (2005) find the same phenomenon in China.

still pending, such as the costs and benefits of information disclosure regulations and the consistency of the theory and practice behind such regulations (Leuz and Wysocki, 2008). I study the economic consequences of the disclosure of audit fee information of China's listed companies, thus providing new evidence from developing countries. And second, the consequences of audit fee levels and changes being an important issue in audit research (Chen, Su, and Wu, 2005), this paper finds that information asymmetry is an important factor influencing these elements from the perspective of regulating information disclosure. This finding thus offers a new way to understand the audit market.

In the following section, I describe the institutional background of China's audit market and analyse the theoretical relation between audit fee information disclosure and audit fee change. Section III describes the research design and sample selection procedures. Sections IV and V report the results of our empirical work, and Section VI concludes the paper.

II. Institutional Background and Theoretical Analysis

Two different opinions prevail about the relation between competition and the audit market. One is that competition helps to improve audit quality (hereafter the "perspective of audit quality improvement"), and the other is that competition ends up damaging audit quality (hereafter the "perspective of audit quality damage"). From the first perspective, appropriate competition may improve the matching between auditors and clients, thus cutting losses from the mismatch between them and improving social welfare. Specifically, market competition can reduce the transaction costs caused by information asymmetry in the audit market as well as by auditor change, while increasing the probability of the latter, thereby improving the match between auditors and clients. Moreover, the expectation of decrease in audit tenure can help not only to lessen the auditor's bluntness caused by long tenure, but also to reduce the economic dependence of the auditor on a client, thereby improving audit quality (Jeter and Shaw, 1995).

US regulators hold the same view. For example, a subcommittee of the US Senate – the Reporting, Accounting, and Management Committee – claimed in a research report that the ban against direct solicitation in the audit market damaged the public interest because it disfranchised the audit receivers' right to know various sorts of information needed to evaluate the audit type, audit volume, and the audit fee (Metcalf Committee, 1976). The Antitrust Division of the US Justice Department holds the same view against the ban.[4] The empirical evidence from the US audit market also supports the perspective of audit quality improvement. Jeter and Shaw (1995) find that the relaxation of the ban

[4] The Antitrust Division of the US Justice Department thought that more adequate information related to audit quality and audit fees was to be found in a market without a ban against direct solicitation than in a market with such a ban (Chaney, Jeter, and Shaw, 1997).

against direct solicitation does not damage but instead improves audit quality, and that the relaxation greatly facilitates the decision to change auditors so as to decrease audit costs (Chaney, Jeter, and Shaw, 1997). Moreover, relaxation of the ban has not damaged the ability of small CPAs to compete (Chaney, Jeter, and Shaw, 1995).

But the perspective of audit quality damage is more pervasive in China, which is in the process of institutional transformation. According to this perspective, over-competition may expedite the out-of-order condition and impair social welfare (Xia and Lin, 2003), because it can compel auditors to compete with one another through low-balling tactics (Cohen Commission, 1978) and by various unfair measures (Xia and Lin, 2003). The CSRC's inspection of CPA practices shows that these phenomena do exist (CSRC, 1998).[5] Unreasonably low audit fees in turn induce auditors to perform audits of lower quality, and not to perform basic audit procedures in some circumstances (CSRC, 1998). Simon and Francis (1988) find that auditors systematically discount the audit fee in order to get the audit contract, that is, low-balling, which damages auditor independence. Hence, low-balling behaviour has become a focus of China's regulators. In 2002 the CSRC and CICPA together promulgated the policy focusing on whether current audit fees were significantly lower than previous fees after a change in auditors; the regulators also talked with auditors in detail and reminded them to maintain audit quality. In 2007, the CSRC and the Ministry of Finance (MoF) further promulgated the *Notice on the Questions of CPAs Performing Securities and Futures-related Business*, which prescribes the MoF and CSRC to pay more attention to those CPAs qualified for the securities business who have behaviours such as an exceptional audit fee. But, according to this view, the supervisory effectiveness of regulators such as the CSRC and MoF also depends on the availability of audit fee information, such that the scarcity of this information invalidates the effect of regulations against CPA behaviour of abandoning audit procedures and cutting audit costs. Without strict regulation, CPAs have broad scope to cut audit costs; for example, they could easily replace more highly skilled CPAs with those of lesser skill or reduce work time to cut such costs. Under these conditions, the key to survival and profit-earning for CPAs is to secure more contracts, and so they rush to discount audit fees. Such low-balling tactics have in fact long existed in China's audit market (Li and Wu, 2002).

But the environment in which CPAs play changed notably with the 6th Notice promulgated by the CSRS on 24 December 2001. According to the regulation, listed companies should disclose their audit and related services fees paid to the auditor starting

[5] With the various interest incentives, some CPAs rushed to discount the audit fee in order to secure the contracts. For example, the audit fee paid by a company that had dozens of branches throughout the country and had a big sale was a little more than 10,000 yuan. At the same time the audit quality was discounted, and basic audit procedures were not performed in some circumstances. Moreover, one auditor provided an unqualified opinion report based only on the material provided by the client and not on performance of the field work (CSRC, 1998).

from 2001. The purpose of this regulation is to help investors more easily judge auditor independence and compliance with professional ethics, and to reduce the information asymmetry between stockholders and management or the auditor so as to improve audit quality (CSRC, 2001). Certainly the disclosure of audit fees has had a big effect on the audit environment and changed the strategy of CPAs. With the disclosure of audit fee information, regulators can easily and timely identify those companies that pay or auditors that receive unreasonably low audit fees; they can then quickly and thoroughly check whether the auditor is cutting audit procedures and costs because of the low audit fee, thereby notably improving the effectiveness of regulation. Because of the remarkable decrease in the scope for reducing audit costs, CPAs must now increase audit prices naturally; otherwise, they will suffer additional losses with more contracts. At the same time, listed companies as receivers of audit services will have an incentive to increase audit fees so as to circumvent more supervision and queries from regulators caused by unreasonably low audit fees. Hence, the behaviour of low-balling will be stunted.

In addition, the disclosure of audit fees may improve the information environment, thereby causing the longstanding unreasonably low audit fees to return to a normal level. Before the public disclosure of audit fee information, auditors themselves found it difficult to acquire detailed knowledge about the audit fees paid by other companies or received by other auditors; this dual lack of bargaining power and information also helped lead to the long existence of unreasonably low audit fees. Now with the disclosure of audit fees, the information asymmetry among the incumbent auditor, potential auditors, and listed companies has decreased notably, allowing them to easily know the situation of audit fees and thus to judge the rationality of a contract. The auditor can now bargain with a company over the audit fee. As the authorities perfect the independent auditing[6] and accounting standards,[7] and as legal liability becomes more stringent, auditors now have ample reason to increase their audit fees. Thus, the longstanding unreasonably low audit fees will return to a normal level.

In contrast, the more likely strategy and consequence is a reduction in the audit fees of those listed companies that have paid unreasonably high fees. Before the disclosure of audit fee information, companies found it difficult to acquire detailed knowledge about the situation of audit fees paid by other companies or received by other auditors, thus making it hard to judge the rationality of contracts. Meanwhile, other auditors had difficulty making reasonable offers to those companies, so the possibility of auditor

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[6] The first batch of nine auditing standards and one practical announcement was promulgated on 1 January 1996; the second batch of eight specific standards and three practical announcements on 1 January 1997; the third batch of nine specific standards and two practical announcements on 1 July 1997; the fourth batch of one specific standard and two practical announcements on 21 January 2001; and the fifth batch of two specific standards and one practical announcement on 30 September 2001.

[7] At the end of 2000, the MoF promulgated the *Accounting Standards for Business Enterprises*, which took effect on 1 January 2001.

change was low and the mismatch of companies and auditors was intensified (Jeter and Shaw, 1997; Shu, 2000). With the disclosure of audit fees, a company can now bargain with the incumbent auditor over the audit fee by referring to other auditors' fees,[8] and other auditors can make competitive offers to the company, thus allowing unreasonably high audit fees to return to a normal level.

Therefore, I develop the following hypothesis:

H1: The disclosure of audit fees will help to decrease the difference in audit fees between listed companies; in other words, the higher the audit fee paid in the previous period, the less it will change in the current period.

But the effect of audit fee information disclosure will differ between different CPAs. Audit demands vary with companies. The establishment and management of China's audit market is largely under the control of the government, and many Chinese-listed companies meet only the lowest level audit requirements stipulated by the authorities (DeFond *et al.*, 2000). As the legal environment improves and market power strengthens, some listed companies that bear more pressure from the market will have the incentive to employ high-quality auditors (Chen and Zhou, 2006). Those companies that hire the Big Five auditors will be willing to pay higher audit fees generally, while in contrast, those companies that hire local auditors will usually pay more attention to decreasing the audit fee (Chen and Zhou, 2006). Moreover, foreign auditors own higher bilateral monopoly power relative to their local counterparts; also, the bargaining power of companies relative to foreign CPAs will decrease because a change in auditor, especially from a foreign to a local auditor, will mean an increase in operating risks and a decrease in audit quality (Shu, 2000; Cai, 2003), in turn leading to a negative market response. Moreover, Chinese regulators manage the audit fees of local CPAs and foreign CPAs differently (*Economic Observer*, 30 October 2004). Foreign auditors are allowed to set audit fees according to audit costs and risks, and a higher audit fee will be accepted by the market because of the auditors' international reputation. In contrast, the audit fees of local auditors are regulated by the audit fee standards established by the CICPA under the

[8] For example, Yantai Wanhua (stock code: 600309) disclosed in its annual financial report of 2001 that when deciding the audit fee paid to the auditor in 2001, the company performed the following procedures. First, it acquired as much information as possible on audit fees paid by Chinese listed companies, especially listed companies in Shangdong province. Second, it acquired information about audits performed by Shangdong Qianju CPA Corporation as well as the business development and internal control systems of the auditor. Finally, it signed the audit contract with the auditor after the board of directors and the meeting of stockholders made the engagement decision. The annual audit fees were, moreover, clearly defined in the audit contract. Similarly, Shennandian (stock code: 000037) disclosed in its 2004 annual financial report that the company defined the audit fee paid to the auditor according to the *Provisional Rule on CPA Service Fee Standards* issued by the Finance Bureau of Shenzhen, as well as by reference to the audit fees paid by other companies of a similar scale upon the approval of the board of directors and the meeting of stockholders.

authorisation of a national administration for price management;[9] moreover, in practice many local governments and departments promulgate various rules to lower the audit fees of local auditors.[10] Consequently, I divide the auditors into two groups – foreign auditors and local auditors – for further research to study the effect of the disclosure of audit fee information on changes in audit fees.

III. Research Design and Sample Selection

(1) Research Design

This paper seeks to study the effect of the disclosure of audit fee information on audit fee changes, which are influenced by many factors. To control for the effect on audit fee changes of changes in accounting standards and company characteristics, I use abnormal audit fee changes as the substitute for audit fee changes based on the design by Chen, Su, and Wu (2005).[11] Specifically, I first estimate abnormal audit fees by company and by year using the following audit fee model:

$$\begin{aligned} LnFEE_t = {} & \alpha_i + \beta_1 \times lnASSET_t + \beta_2 \times INVREC_t + \beta_3 \times CURRENT_t \\ & + \beta_4 \times LEV_t + \beta_5 \times ACIDR_t + \beta_6 \times ROA_t + \beta_7 \times OPINION_t \\ & + \beta_8 \times LOCALCPA_t + \varepsilon_t \ , \end{aligned} \qquad (1)^{12}$$

where $LnFEE_t$ is the natural logarithm of audit fees; ln$ASSET_t$ is the natural logarithm of total assets; $INVREC_t$ is the ratio of current accounts receivable and inventory to total assets; $CURRENT_t$ is the ratio of current assets to total assets; LEV_t is the ratio of total liability to total assets; $ACIDR_t$ is the ratio of current assets to current liability; ROA_t is the ratio of current operating income to total assets; $OPINION_t$ takes the value of 0 if the opinion is unqualified, and 1 otherwise; $LOCALCPA_t$ takes the value of 0 if the auditor is a foreign CPA, and 1 otherwise; and $ABNFEE_t$ is an abnormal audit fee of firm i in year t.

In Model (1) the residual error ε_t is the abnormal audit fee of the company ($ABNFEE_t$); I then estimate the change in abnormal audit fees by subtracting the previous from the current abnormal audit fee, that is, $\Delta ABNFEE_t = \varepsilon_t - \varepsilon_{t-1}$. Afterwards, I use the regression model listed below to study the effect of the disclosure of audit fee information on audit fee changes, borrowing from the model of audit fee changes designed by Wu (2003):

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[9] Article 6 of Decree No. 2255 in 1999 (*Administrative Regulation on Intermediary Service Fees*) prescribes that for some intermediary services with industry and technical monopolies, such as inspection, appraisal, notarisation, and arbitration, standard prices are to be introduced. The prices are to be set in the domestic market based on the total assets of the auditee or work hours of the CPAs.

[10] *Economic Observer*, 30 October 2004.

[11] According to the referee's suggestion, I use the audit fee model to estimate the abnormal audit fee and study the economic consequences of the disclosure of audit fee information.

[12] For simplicity, I cancel the i from the variables.

$$\Delta ABNFEE_t = \alpha_i + \beta_1 \times \Delta lnASSET_t + \beta_2 \times \Delta NVREC_t + \beta_3 \times \Delta LEV_t + \beta_4 \times \Delta ROA_t + \beta_5 \times LOSS_t + \beta_6 \times DUAL_t + \beta_7 \times SWITCH_t + \beta_8 \times IMPROVE_t + \beta_9 \times LOCALCPA_t + \beta_{10} \times RANK_t + \varepsilon_t \ , \quad (2)$$

where $\Delta InASSET_t$ is the change in natural logarithm of total assets; $\Delta INVREC_t$ is the change in *INVREC*; ΔLEV_t is the change in financial leverage; ΔROA_t is the change in *ROA; LOSS*$_t$ is a dummy that equals 1 if the company posts a net loss, and 0 otherwise; $DUAL_t$ is a dummy variable that equals 1 if the company issues A and H shares, and 0 otherwise; $SWITCH_t$ takes the value of 1 for firms that switch auditors and 0 for those that do not; $IMPROVE_t$ is a dummy variable that takes the value of 1 if the current audit opinion improves relative to the previous year, and 0 otherwise, according to Chen, Su, and Wu (2005); $LOCALCPA_t$ takes the value of 0 if the auditor is a foreign CPA, and 1 otherwise; and $ABNFEE_t$ is an abnormal audit fee of firm i in year t. As for $RANK_t$, I rank firms according to the abnormal audit fee (percentage) and then assign a variable with the values of 0, 1, 2, 3, and 4 through 9 according to the ranking order; I then divide them by 9, the results meaning that the lower the number, the lower the audit fee rank.

(2) Sample Selection and Descriptive Statistics

Considering that this paper studies the effect of the disclosure of audit fee information on changes in audit fees, the sample must simultaneously have audit fees for years 2001 and 2002. At the same time I select the sample according to the following criteria: (1) companies must issue A shares or A and B shares simultaneously; (2) companies must not belong to the financial industry (six are excluded); and (3) related financial data must be complete. I thus obtain 752 listed companies. In addition, I gather the audit fees paid by companies for 2000; the data of 612 companies are taken from their 2001 annual reports. Since the remaining 140 companies did not disclose their audit fees for 2000 in their 2001 annual reports, I use the audit fee they paid in 2001 instead.[13]

I take the audit fee and CPA data from the annual reports published by companies, and the financial and market transaction data from the China Stock Market and Accounting Research (CSMAR) database (2005 edition) jointly developed by The Hong Kong Polytechnic University and GTA.

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[13] The purpose of substituting the audit fee of 2001 for the audit fee of 2000 is to maintain consistency of data in order to reduce the effect of data inconsistency on the results. In the robust test, I perform the test again after excluding the 140 companies.

Table 1 indicates that the audit fee paid by companies in 2001 and 2002 shows an ascending trend; the mean increase is 41,166.18 renminbi, and the largest is 2,780,000 renminbi (Huaneng International, stock code: 600011). This is consistent with the trend of perfection in auditing and accounting standards, which requires auditors to work harder and put in more time, thus leading to an increase in audit fees.

Table 1 Descriptive Statistics

						Percentage		
Variables	N	Mean	S.D.	Min	Max	25%	50%	75%
ΔFEE_t	1504	41166.180	212998.450	-2000000.000	2780000.000	0.000	0.000	70000.000
$\Delta ABNFEE_t$	1503	0.000	0.255	-1.610	1.720	-0.091	-0.006	0.066
$\Delta DUAL_t$	1504	0.120	0.320	0.000	1.000	0.000	0.000	0.000
$\Delta IMPROVE_t$	1504	0.080	0.275	0.000	1.000	0.000	0.000	0.000
$\Delta \ln ASSET_t$	1504	0.072	0.259	-2.940	1.370	-0.021	0.062	0.177
$\Delta INVREC_t$	1504	-0.013	0.087	-0.693	0.591	-0.043	-0.008	0.019
ΔLEV_t	1503	0.044	0.391	-3.037	9.994	-0.023	0.017	0.068
ΔROA_t	1504	-0.029	0.399	-10.007	4.028	-0.029	-0.007	0.006
$\Delta LOSS_t$	1503	0.130	0.338	0.000	1.000	0.000	0.000	0.000
$\Delta SWITCH_t$	1504	0.160	0.366	0.000	1.000	0.000	0.000	0.000
$\Delta LOCALCPA_t$	1504	0.890	0.313	0.000	1.000	1.000	1.000	1.000

Note: ΔFEE_t is the change in audit fee (unit: renminbi)

Table 2 Comparison of Abnormal Audit Fees and Changes between 2001 and 2002

Rank by abnormal	2001		2002		Difference	
audit fee for 2001	Mean	Median	Mean	Median	Mean	Median
1	-0.738	-0.695	-0.498	-0.550	0.240	0.129
2	-0.442	-0.443	-0.306	-0.381	0.136	0.022
3	-0.277	-0.276	-0.223	-0.235	0.054	0.006
4	-0.152	-0.150	-0.123	-0.169	0.030	-0.013
5	-0.056	-0.055	0.005	-0.090	0.061	-0.030
6	0.045	0.044	0.060	-0.004	0.014	-0.041
7	0.155	0.157	0.074	0.059	-0.081	-0.085
8	0.274	0.270	0.238	0.198	-0.036	-0.060
9	0.414	0.408	0.240	0.307	-0.175	-0.114
10	0.758	0.668	0.522	0.478	-0.236	-0.160
t test[b]	33.930***		16.732***		-8.520***	
Mann-Whitney test[b]		-23.733***		-16.090***		-8.007***

Note: 1 is for firms whose audit fee for 2001 belongs to the lowest 10%, 2 is for the lowest 20%, and so on; [b] denotes the results of comparing the lower 50% abnormal audit fee of 2001 with the higher 50%; *, **, and *** denote significance at the 0.10, 0.05, and 0.01 levels (two-tailed), respectively.

Table 3 Comparison of Abnormal Audit Fees and Changes between 2001 and 2002 – Local CPAs

Rank by abnormal	2001		2002		Difference	
audit fee for 2001	Mean	Median	Mean	Median	Mean	Median
1	-0.743	-0.695	-0.493	-0.542	0.250	0.154
2	-0.445	-0.448	-0.309	-0.392	0.136	0.012
3	-0.276	-0.273	-0.223	-0.232	0.053	0.013
4	-0.152	-0.150	-0.120	-0.173	0.032	-0.020
5	-0.057	-0.056	0.010	-0.082	0.066	-0.020
6	0.046	0.044	0.064	-0.002	0.018	-0.041
7	0.155	0.156	0.066	0.053	-0.088	-0.085
8	0.274	0.270	0.250	0.221	-0.024	-0.055
9	0.417	0.408	0.250	0.315	-0.167	-0.111
10	0.712	0.650	0.446	0.440	-0.266	-0.183
t test[b]	32.512***		15.435***		-7.944***	
Mann-Whitney test[b]		-22.465***		-14.934***		-7.220***

Note: 1 is for firms whose audit fee for 2001 belongs to the lowest 10%, 2 is for the lowest 20%, and so on; [b] denotes the results of comparing the lower 50% abnormal audit fee for 2001 with the higher 50%; *, **, and *** denote significance at the 0.10, 0.05, and 0.01 levels (two-tailed), respectively.

Table 4 Comparison of Abnormal Audit Fees and Changes between 2001 and 2002 – Foreign CPAs

Rank by abnormal	2001		2002		Difference	
audit fee for 2001	Mean	Median	Mean	Median	Mean	Median
1	-0.720	-0.685	-0.631	-0.550	0.129	0.129
2	-0.425	-0.406	-0.331	-0.381	0.071	0.022
3	-0.280	-0.296	-0.301	-0.235	-0.005	0.006
4	-0.152	-0.155	-0.165	-0.169	-0.010	-0.013
5	-0.035	-0.035	-0.153	-0.090	-0.119	-0.030
6	0.023	0.023	-0.103	-0.004	-0.126	-0.041
7	0.160	0.173	0.093	0.059	-0.103	-0.085
8	0.267	0.270	0.040	0.198	-0.224	-0.060
9	0.390	0.377	0.143	0.307	-0.238	-0.114
10	0.944	0.773	0.736	0.478	-0.096	-0.160
t test[b]	11.977***		6.473***		-3.143***	
Mann-Whitney test[b]		-7.535***		-5.799***		-3.665***

Note: 1 is for firms whose audit fee for 2001 belongs to the lowest 10%, 2 is for the lowest 20%, and so on; [b] denotes the results of comparing the lower 50% abnormal audit fee of 2001 with the higher 50%; *, **, and *** denote significance at the 0.10, 0.05, and 0.01 levels (two-tailed), respectively.

As shown in Tables 2 to 4, I test the effect of the disclosure of audit fee information on trends in audit fee changes. Table 2 indicates that companies that paid a less abnormal audit fee in the previous year continued to pay a lesser fee in the subsequent year, but they also had a significantly larger increase in audit fee changes than that of companies that paid a higher audit fee in the previous year. This means that the condition of CPAs receiving low audit fees improved significantly after the audit fee disclosure, and the audit fee gap between CPAs narrowed to some degree. When I divide the sample into local CPAs and foreign CPAs, I obtain the same results.

Moreover, I find from Tables 3 and 4 that the difference in abnormal audit fee changes between the highest and the lowest audit fee companies in the local CPA market for 2001 is 0.516 {0.25-(-0.266)}, but in the foreign CPA market, the difference is only 0.225 {0.129-(-0.096)}. The former is 2.29 times the latter, implying that the price elasticity in the local CPA market is higher than that in the foreign CPA market. The audit fee paid by companies that paid the lower audit fee in the local CPA market increases more than that in the foreign CPA market, whereas the audit fee paid by companies that paid the higher audit fee in the local CPA market decreases more than that in the foreign CPA market.

The competitive hypothesis for the above results is that the mean reversal in audit fees leads to a decrease in audit fee differences. Because unreasonably high audit fees cannot continuously increase and unreasonably low fees continuously decrease, the audit fee difference naturally decreases within a certain period. Some companies disclosed the audit fee for 2000 in 2001, which is the first year that companies disclosed their fees. Since the companies could not change the fee that had been paid or set in the previous year, the audit fee level and change between 2000 and 2001 could not have been influenced by the 6th Notice; I can thus test the competitive hypothesis by testing the change in audit fee for 2001. If the decrease in the audit fee difference is caused partly by the mean reversal in audit fees, I can predict that the same phenomenon will continue in 2001. In contrast, I have reason to believe that the decrease in audit fee difference is caused mainly by audit fee disclosure. I then compare the differences for 2001 as follows; the results are listed in Tables 5 to 7.

From Table 5, the change in audit fee is significantly and negatively correlated with the previous audit fee level, but the degree of difference is less than that in 2002. When I exclude the 140 companies that did not disclose their audit fees in their 2001 annual reports, the result is consistent with Table 5. Meanwhile, I divide the sample into local CPAs and foreign CPAs, and test for the change in audit fee, the results of which are listed in Tables 6 and 7. From these tables, I find that the difference in abnormal audit fee changes between the highest and the lowest audit fee companies in the local CPA market in 2000 is 0.068 {0.023-(-0.045)}, whereas in the foreign CPA market the difference is 0.069 {0.046-(-0.023)}. This means there were no significant differences between changes in audit fees in the local and the foreign CPA markets before the disclosure of audit fee information was implemented.

Table 5 Comparison of Abnormal Audit Fees and Changes between 2000 and 2001

Rank by abnormal	2000		2001		Difference	
audit fee for 2000	Mean	Median	Mean	Median	Mean	Median
1	-0.743	-0.679	-0.716	-0.691	0.028	0.019
2	-0.452	-0.446	-0.439	-0.423	0.013	0.015
3	-0.282	-0.277	-0.259	-0.250	0.023	0.024
4	-0.155	-0.148	-0.155	-0.142	0.000	0.017
5	-0.056	-0.053	-0.046	-0.042	0.010	0.021
6	0.044	0.035	0.038	0.042	-0.005	0.008
7	0.148	0.151	0.146	0.157	-0.002	0.003
8	0.270	0.272	0.262	0.263	-0.008	-0.006
9	0.433	0.432	0.417	0.408	-0.017	-0.006
10	0.774	0.692	0.734	0.661	-0.040	-0.022
t test[b]	33.836***		31.410***		-4.161***	
Mann-Whitney test[b]		-23.733***		-22.796***		-4.729***

Note: 1 is for firms whose audit fee for 2000 belongs to the lowest 10%, 2 is for the lowest 20%, and so on; [b] denotes the results of comparing the lower 50% abnormal audit fee of 2000 with the higher 50%; *, **, and *** denote significance at the 0.10, 0.05, and 0.01 levels (two-tailed), respectively.

Table 6 Comparison of Abnormal Audit Fees and Changes between 2000 and 2001 – Local CPAs

Rank by abnormal	2000		2001		Difference	
audit fee for 2001	Mean	Median	Mean	Median	Mean	Median
1	-0.745	-0.676	-0.722	-0.690	0.023	0.019
2	-0.452	-0.446	-0.438	-0.422	0.014	0.017
3	-0.278	-0.274	-0.252	-0.241	0.026	0.025
4	-0.155	-0.146	-0.152	-0.138	0.003	0.018
5	-0.055	-0.053	-0.043	-0.042	0.013	0.021
6	0.044	0.035	0.033	0.039	-0.010	0.005
7	0.148	0.151	0.148	0.157	-0.001	0.002
8	0.269	0.272	0.263	0.264	-0.006	-0.004
9	0.436	0.433	0.419	0.408	-0.016	-0.001
10	0.721	0.652	0.675	0.642	-0.045	-0.030
t test[b]	32.339***		29.403***		-4.017***	
Mann-Whitney test[b]		-22.298***		-21.262***		-4.626***

Note: 1 is for firms whose audit fee for 2001 belongs to the lowest 10%, 2 is for the lowest 20%, and so on; [b] denotes the results of comparing the lower 50% abnormal audit fee of 2001 with the higher 50%; *, **, and *** denote significance at the 0.10, 0.05, and 0.01 levels (two-tailed), respectively.

Table 7 Comparison of Abnormal Audit Fees and Changes between 2000 and 2001 – Foreign CPAs

Rank by abnormal	2000		2001		Difference	
audit fee for 2001	Mean	Median	Mean	Median	Mean	Median
1	-0.738	-0.706	-0.692	-0.691	0.046	0.019
2	-0.451	-0.438	-0.443	-0.449	0.008	0.011
3	-0.306	-0.293	-0.309	-0.338	-0.002	-0.015
4	-0.160	-0.161	-0.200	-0.177	-0.040	0.000
5	-0.059	-0.055	-0.101	-0.072	-0.042	-0.015
6	0.042	0.041	0.095	0.136	0.052	0.048
7	0.144	0.143	0.132	0.137	-0.012	0.018
8	0.288	0.301	0.239	0.206	-0.049	-0.054
9	0.418	0.413	0.397	0.377	-0.021	-0.024
10	0.974	0.827	0.952	0.806	-0.023	-0.018
t test[b]	12.217***		12.344***		-1.144	
Mann-Whitney test[b]		-8.059***		-8.034***		-1.343

Note: 1 is for firms whose audit fee for 2001 belongs to the lowest 10%, 2 is for the lowest 20%, and so on; [b] denotes the results of comparing the lower 50% abnormal audit fee of 2001 with the higher 50%; *, **, and *** denote significance at the 0.10, 0.05, and 0.01 levels (two-tailed), respectively.

IV. Empirical Results and Analysis

(1) Basic Empirical Results and Analysis

In the column 2002 relative to 2001, I find that the regression coefficient of the explanatory variable $RANK_t$ is significantly negative after controlling for other variables related to audit fee changes. This means that audit fee disclosure indeed improves China's audit market and reduces the difference in audit fees. When I divide the sample into local and foreign CPAs and re-regress Model (2), the regression coefficient of $RANK_t$ is still significantly negative. Moreover, I find that the increase in assets and leverage reduces the change in abnormal audit fees, while the increase in accounts receivable and the inventory ratio enhances this change.

The question is whether the negative correlation between the abnormal audit fee change and $RANK_t$ is caused by the disclosure in audit fee information or the reversal in the audit fee mean. If the decrease in the audit fee difference is caused partly by the mean reversal in the audit fee, I can predict that the phenomenon will still exist in 2001. In contrast, I have reason to believe that the decrease in audit fee differences is caused mainly by the disclosure of audit fees. Therefore, for the same reasons as in Section II, I re-regress Model (2); the results are listed in the column 2001 relative to 2000 in Table 8. These indicate that the regression coefficient of $RANK_t$ is not statistically significant, and that the regression coefficients of the other control variables are the same as those for 2002. Thus, the hypothesis of a mean reversal is not supported.

In short, Hypothesis 1 is supported to a certain degree; the disclosure of audit fee information has improved China's audit market and reduced the difference in audit fees.

Table 8 Audit Fee Disclosure and Abnormal Audit Fee Changes

Variables	2002 relative to 2001			2001 relative to 2000		
	Full	Local	Foreign	Full	Local	Foreign
Intercept	0.144	0.191	0.118	0.035	0.042	0.022
	(3.289***)	(7.472***)	(1.523)	(5.190***)	(9.729***)	(2.442***)
$\Delta InASSET_t$	-0.127	-0.094	-0.139	-0.294	-0.291	-0.292
	(-2.066**)	(-1.485)	(-0.450)	(-33.695***)	(-31.362***)	(-10.203***)
$\Delta INVREC_t$	0.272	0.262	0.030	0.108	0.098	0.193
	(1.590)	(1.486)	(0.047)	(5.472***)	(4.656***)	(2.688***)
ΔLEV_t	-0.091	-0.090	-0.123	-0.215	-0.212	-0.255
	(-2.3**)	(-2.275**)	(-0.174)	(-17.736***)	(-16.739***)	(-4.38***)
ΔROA_t	-0.039	-0.046	2.562	-0.045	-0.045	-0.096
	(-0.965)	(-1.140)	(2.433**)	(-3.547***)	(-3.490***)	(-0.750)
$LOSS_t$	0.022	0.029	0.212	-0.022	-0.024	0.011
	(0.575)	(0.727)	(1.207)	(-3.471***)	(-3.67***)	(0.53)
$DUAL_t$	0.089	0.109	0.040	-0.024	-0.025	-0.025
	(2.257**)	(2.361**)	(0.509)	(-3.748***)	(-3.184***)	(-2.570**)
$SWITCH_t$	0.052	0.036	-0.063	-0.001	-0.003	0.021
	(1.184)	(0.787)	(-0.347)	(-0.183)	(-0.559)	(1.87*)
$IMPROVE_t$	0.083	0.049	0.495	0.004	0.002	0.024
	(1.733*)	(1.006)	(1.987*)	(0.606)	(0.275)	(0.906)
$RANK_t$	-0.391	-0.395	-0.330	-0.007	-0.009	0.006
	(-10.597***)	(-9.966***)	(-3.121***)	(-1.218)	(-1.300)	(0.488)
$LOCALCPA_t$	0.046			0.006		
	(1.105)			(0.921)		
Adjusted R^2	0.149	0.145	0.288	0.710	0.703	0.795
F	14.146***	13.659***	4.454***	185.249***	175.023***	38.534***
N	751	673	78	751	663	88

Note: The figures in parentheses are t values; *, **, and *** denote significance at the 0.10, 0.05, and 0.01 levels (two-tailed), respectively.

(2) Robustness Test

I estimate the key variable in the research $\Delta ABNFEE_t$ using the audit fee model; whether it is effective is important to the finding, although the R^2 of the model using the audit fees for 2000 – 2002 is greater than 37 per cent. Hence, I directly use $\Delta LnFEE_t$

{change in audit fee (ln)} as the abnormal audit fee change to re-regress Model (2), considering that this change is significantly and positively related to the actual change in audit fees (Chen, Su, and Wu, 2005). The results are listed in Table 9.

Table 9 shows that the regression coefficient of $RANK_t$ is still significantly negative when using the data for 2002, but significantly positive when using the data for 2001, especially in the local CPA market. The above results further prove that the change in audit fees for 2002 is caused mainly by audit fee disclosure and not the mean reversal in audit fees.

Table 9 Audit Fee Disclosure and Abnormal Audit Fee Changes – Robustness Test

Variables	2002 relative to 2001			2001 relative to 2000		
	Full	Local	Foreign	Full	Local	Foreign
Intercept	0.249	0.255	0.210	-0.039	-0.011	0.057
	(5.557***)	(9.839***)	(2.706***)	(-1.019)	(-0.444)	(0.910)
$\Delta InASSET_t$	0.224	0.269	0.134	0.038	0.057	-0.234
	(3.561***)	(4.192***)	(0.434)	(0.770)	(1.097)	(-1.185)
$\Delta INVREC_t$	0.203	0.175	-0.07	-0.213	-0.282	0.431
	(1.1590)	(0.981)	(-0.107)	(-1.904*)	(-2.405**)	(0.868)
ΔLEV_t	-0.008	-0.004	0.104	-0.151	-0.154	0.646
	(-0.207)	(-0.090)	(0.147)	(-2.198**)	(-2.183**)	(1.604)
ΔROA_t	-0.041	-0.048	2.474	-0.041	-0.050	1.409
	(-0.978)	(-1.159)	(2.339**)	(-0.582)	(-0.696)	(1.597)
$LOSS_t$	0.043	0.051	0.259	-0.038	-0.034	-0.071
	(1.093)	(1.274)	(1.467)	(-1.067)	(-0.923)	(-0.484)
$DUAL_t$	0.052	0.064	0.035	0.007	0.029	-0.068
	(1.287)	(1.371)	(0.436)	(0.182)	(0.649)	(-1.03)
$SWITCH_t$	-0.004	-0.044	0.127	-0.017	-0.028	0.082
	(-0.091)	(-0.969)	(0.700)	(-0.653)	(-1.031)	(1.045)
$IMPROVE_t$	0.040	-0.004	0.542	0.013	-0.006	0.043
	(0.814)	(-0.089)	(2.165**)	(0.339)	(-0.165)	(0.242)
$RANK_t$	-0.375	-0.372	-0.352	0.193	0.218	0.115
	(-9.948***)	(-9.271***)	(-3.316***)	(5.603***)	(5.767***)	(1.306)
$LOCALCPA_t$	0.006			0.042		
	(0.137)			(1.173)		
Adjusted R^2	0.122	0.129	0.298	0.053	0.066	0.000
F	11.449***	12.040***	4.640***	5.197***	6.219	1.001
N	751	673	78	751	663	88

Note: The figures in parentheses are t values; *, **, and *** denote significance at the 0.10, 0.05, and 0.01 levels (two-tailed), respectively.

Considering that the relation between the audit fee level in the previous year $RANK_t$ and the change in audit fee is nonlinear, I use a logistic model to test Hypothesis 1 after treating the variable for audit fee change as a dummy variable $ABFINCREASERANK_t$ (taking the value of 1 when abnormal audit fees increase, and 0 otherwise). The results indicate that the regression coefficient of $RANK_t$ is significantly negative in 2002 but not significant in 2001.

Moreover, I exclude the companies that simultaneously issue B shares and/or H shares, since their audit fees and characteristics differ from those of A-share companies. The results imply that the regression coefficient of $RANK_t$ is significantly negative in 2002 but not significant in 2001.

In view of the above, I can preliminarily conclude that the implementation of the disclosure of audit fee information from 2001 eased the information asymmetry between investors and companies/auditors to a certain extent. Furthermore, under the pressure of stockholders and regulators, unreasonably low audit fees have increased, which may have led to more work input by auditors and improved audit quality. But these conclusions require additional empirical evidence.

V. Further Research: Do Abnormal Audit Fees Damage the Value Relevance of Accounting Earnings?

The above research shows that the regulation on disclosing audit fee information which took effect from 2001 may have raised unreasonably low audit fees, but I still do not know whether this increase has improved audit quality, or whether unreasonably low fees truly damage audit quality in the first place. In the following section, I further study the relation between abnormal audit fees and audit quality to test the consequence of mandated disclosure of audit fee information. The role of auditing is to lend credibility to accounting earnings (DeAngelo, 1981), and a high quality audit implies a high value relevance of accounting earnings (Teoh and Wong, 1993); thus, I predict that the value relevance of the accounting earnings of companies that pay unreasonably low audit fees will be lower if an unreasonably low audit fee does damage audit quality. In short, I propose the following hypothesis to study further the effect of abnormal audit fees on audit quality:

H2: The value relevance of the accounting earnings of those companies that pay an unreasonable audit fee will be relatively lower than that of other companies.

Moreover, unreasonably high audit fees may suggest that companies are shopping for opinions from auditors (Chen, Su, and Wu, 2005; Francis and Ke, 2006; Fang and Hong, 2008), thus leading to queries about an auditor's independence. Therefore, I divide the sample into two sub-samples – one with negative abnormal audit fees and the other with positive abnormal audit fees – to study the effect of abnormal audit fees on audit quality.

I could adopt either of two methods to test the value relevance of accounting earnings, one based on an event study, and the other on a relation study. For the reasons listed below, I use the model based on a relation study. According to this model, the long-term stock return (generally one year) is considered to be economic income; the value relevance of accounting earnings is then evaluated by the correlation between accounting earnings and stock return. The model based on an event study must assume that the market knows whether the audit fee is abnormal when the company announces the annual report, but for those companies that announce their reports earlier, investors cannot know if this is the case. The model based on a relation study, on the other hand, can avoid this restriction. Moreover, the periodic reporting by Chinese companies usually includes other significant information influencing stock returns apart from accounting earnings, such as stock dividends, asset restructuring, and management changes; this makes it more difficult for the model based on an event study to rule out the effect of noise information (Yu and Cheng, 1996). Thus, the model based on a relation study is more appropriate for testing the effect of abnormal audit fees on the value relevance of accounting earnings (Subramanyam, 1996). The following is a model of the value relevance of accounting earnings based on a relation study, which I use to test Hypothesis 2:

$$\begin{aligned} RET_t = {} & \alpha_i + \beta_1 \times E/P_t + \beta_2 \times P/B_t + \beta_3 \times LEV_t + \beta_4 \times OPINION_t + \beta_5 \times LnMV_t + \beta_6 \\ & \times LOCALCPA_t + \beta_7 \times ABNFEE_t + \beta_8 \times E/P_t \times P/B_i + \beta_9 \times E/P_t \times LEV_1 \\ & + \beta_{10} \times E/P_t \times OPINION_1 + \beta_{11} \times E/P_t \times LnMV_1 + \beta_{12} \times E/P_t \\ & \times LOCALCPA_1 + \beta_{13} \times E/P_t \times ABNFEE_t + \varepsilon_t , \end{aligned} \tag{3}$$

where RET_t is the annual stock return (including cash dividends) of firm i between the last transaction day in April in year t and the last transaction day in April in year t+1; E/P_t is earnings per share divided by price per share; P/B_t is price per share divided by net assets per share; LEV_t is the ratio of total liability to total assets; $OPINION_t$ takes the value of 0 if the opinion is unqualified, and 1 otherwise; $LnMV_t$ is the natural logarithm of market value at the end of year t-1; $LOCALCPA_t$ takes the value of 0 if the auditor is a foreign CPA, and 1 otherwise; and $ABNFEE_t$ is the abnormal audit fee of firm i in year t.

Since the relation between control variables and the value relevance of accounting earnings may be nonlinear, the continuous variables, such as P/B_t, LEV_t, and $LnMV_t$, are treated as dummy variables according to Teoh and Wong (1993). Specifically, these variables take a value of 1 when they are greater than the median, and 0 otherwise. Moreover, $ABNFEE_t$ can be both a continuous variable and a discrete variable ($RANK_t$). Considering that the regulator can easily monitor the companies/auditors that pay/receive unreasonably low audit fees and thus reduce the adverse effects of a low audit fee, I focus on years 2001 and 2000.[14]

[14] 2001 is the first year that companies were required to disclose the audit fee. Regulators were unable to monitor the audit activities effectively because the activities were completed before they knew the audit fee.

Table 10 Abnormal Audit Fees and the Value Relevance of Accounting Earnings – Based on $ABNFEE_t$

	Full		Negative $ABNFEE_t$		Positive $ABNFEE_t$	
Variable	b	t	b	t	b	t
Intercept	0.037	0.506	-0.103	-0.944	0.066	0.566
E/P_i	10.962	4.373 ***	18.197	4.680 ***	7.864	2.138 **
P/B_t	0.091	2.661***	0.123	2.617***	0.096	1.851*
LEV_t	0.083	2.171**	0.175	3.279***	0.005	0.087
$OPINION_t$	0.066	2.224**	0.052	1.245	0.102	2.402**
$LnMV_t$	-0.196	-5.623***	-0.198	-4.056***	-0.175	-3.381***
$LOCALCPA_t$	0.066	1.011	0.113	1.208	0.042	0.438
$ABNFEE_t$	0.041	1.040	-0.038	-0.428	0.107	1.073
$E/P_t \times P/B_i$	2.086	2.129**	-1.744	-1.101	3.998	2.623***
$E/P_t \times LEV_i$	-5.421	-4.030***	-7.037	-3.665***	-3.658	-1.890*
$E/P_t \times OPINION_i$	-5.224	-4.884***	-1.701	-0.919	-5.249	-3.576***
$E/P_t \times LnMV_i$	1.097	1.174	-0.626	-0.422	2.168	1.504
$E/P_t \times LOCALCPA$	-0.748	-0.320	-2.765	-0.771	-0.155	-0.048
$E/P_t \times ABNFEE_t$	0.728	0.757	4.378	1.667*	-0.744	-0.248
Adjusted R^2	0.101		0.135		0.083	
F	12.375***		9.030***		5.465***	
N	1317		671		646	

Note: *, **, *** denote significance at the 0.10, 0.05, and 0.01 levels (two-tailed), respectively.

Table 10 lists the regression results using the continuous variable design of $ABNFEE_t$. When using the full sample, I find the regression coefficient of $E/P_t \times ABNFEE_t$ is not significant statistically, but after dividing the sample into two groups – negative $ABNFEE_t$ and positive $ABNFEE_t$ – I find different results. For the negative $ABNFEE_t$ sub-sample, the regression coefficient of $E/P_t \times ABNFEE_t$ is significantly positive, which means that an unreasonable audit fee does indeed damage audit quality. But I do not find the same result for the positive $ABNFEE_t$ sub-sample, which implies there is no evidence that unreasonably high audit fees damage audit quality. The results listed in Table 11 using the discrete variable design of $ABNFEE_t$ are basically consistent with those in Table 10, though the significance decreases. These results differ from the findings of Fang and Hong (2008), possibly because the data are different; Fang and Hong (2008) use the actual change in audit fee as the abnormal audit fee, and they do not distinguish between the negative and positive audit fee samples.

Table 11 Abnormal Audit Fees and the Value Relevance of Accounting Earnings – Based on $RANK_t$

	Full		Negative $ABNFEE_t$		Positive $ABNFEE_t$	
Variable	b	t	b	t	b	t
Intercept	0.014	0.185	-0.076	-0.725	0.025	0.148
E/P_i	10.759	4.112***	15.307	3.853***	9.578	1.915*
P/B_t	0.091	2.662***	0.121	2.571***	0.094	1.807*
LEV_t	0.082	2.157**	0.173	3.228***	0.006	0.109
$OPINION_t$	0.066	2.214**	0.053	1.27	0.101	2.357**
$LnMV_t$	-0.195	-5.591***	-0.195	-4.017***	-0.175	-3.371***
$LOCALCPA_t$	0.067	1.022	0.121	1.294	0.033	0.343
$RANK_t$	0.044	0.855	-0.084	-0.549	0.109	0.673
$E/P_t \times P/B_i$	2.064	2.104**	-1.618	-1.023	4.22	2.627***
$E/P_t \times LEV_i$	-5.422	-4.029***	-6.901	-3.592***	-3.79	-1.96**
$E/P_t \times OPINION_i$	-5.225	-4.88***	-1.594	-0.848	-5.233	-3.563***
$E/P_t \times LnMV_i$	1.046	1.123	-0.796	-0.549	2.363	1.581
$E/P_t \times LOCALCPA$	-0.908	-0.39	-3.256	-0.906	-0.362	-0.114
$E/P_t \times RANK_t$	0.728	0.565	7.682	1.605	-2.406	-0.511
Adjusted R^2	0.100		0.135		0.082	
F	12.298***		9.012***		5.409***	
N	1317		671		646	

Note: *, **, *** denote significance at the 0.10, 0.05, and 0.01 levels (two-tailed), respectively.

VI. Conclusion

This paper studies the economic consequences of the regulation of information disclosure by testing the effect on the audit market of the disclosure rules for audit fee information. Specifically, I study whether audit fee disclosure improves the audit environment in China and reduces the large difference in audit fees; I then further study the effect of abnormal audit fees on audit quality. The results indicate that the changes in audit fees in 2002 are significantly and negatively correlated with audit fees from the previous year, implying that the disclosure of audit fee information has reduced the extremities in audit fees. Moreover, empirical evidence shows that unreasonable audit fees do indeed damage audit quality to some degree. In general, audit fee disclosure has improved the audit environment in China.

References

Please refer to pp. 125-126.