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July 24, 2008

Nancy M. Morris

Secretary

Securities and Exchange Commission

100 F Street, NE

Washington, DC 20549-1090

RE: S7-11-08 - Proposed Rule - Interactive Data to Improve Financial Reporting

Dear Ms. Morris:

I am writing you on behalf of the California Public Employees' Retirement System (CalPERS). CalPERS is the 4th¹ largest retirement system in the world and the largest public pension system in the U.S., CalPERS manages approximately \$248 billion in assets providing retirement and health benefits for nearly 1.5 million members.

Thank you for the opportunity to comment on the Security Exchange Commission's (SEC's) Proposed Rule on the use of interactive data to improve financial reporting. As an investor and provider of long-term of capital, CalPERS has a great interest in the improvement of financial reporting. We agree with the SEC on the need to update filing standards and systems as technologies improve and that these developments assists the SEC in its goal to promote efficient and transparent capital markets.

Financial reporting based on interactive data, specifically eXtensible Business Reporting Language (XBRL) provides great opportunities for investors, analysts and other users to retrieve, analyze and compare companies' financial reporting. Interactive data could provide more transparency, comparability and increase the speed, accuracy and usability of financial disclosures. The standard list of tags should provide more reliable data and self-validating mechanisms built into the XBRL language through its taxonomies (data dictionaries that define different

¹ Pensions & Investments, "P&I/ Watson Wyatt world's 300 largest retirement plans", 2007 Data book, Page 28, December 24, 2007.

industries' mandatory and commonly used reporting concepts). Additionally, a substantive benefit, XBRL tagged data maintains its calculations and provides direct reference through links to authoritative references and source documents.

CalPERS believes in the long-term, the use of interactive data, XBRL, will improve financial reporting. However, key to these benefits to investors is the ability to obtain financial reporting in XBRL on companies and its peers. CalPERS agrees with the SEC that there is a "network effect" such that interactive data would not necessarily be useful unless many or all filers provide financial reporting using interactive data.

CalPERS offers the following comments:

Submission of Financial Information Using Interactive Data

CalPERS supports adoption of rules that require each filer's financial statements to be provided in interactive data format. Investors and other users of financial reporting will not benefit from the use of interactive data until more public companies file using the XBRL format. We do agree that a phased-in approach of tagging financial statement information may provide a more credible, tested approach and allow users to become more confident prior to detailed tagging of the financial statement footnotes. However, to provide more consistent and comparable data (though not boiler-plate language) we see a great benefit in the ability to sort and compare detailed footnotes of a company's peer groups. Long-term, we see and agree the benefit with providing interactive data for Management's Discussion and Analysis, executive compensation and other statistical or narrative disclosures.

CalPERS agrees that if the technology is sufficiently developed the proposed rules should encourage a format where the entire set of financial statements can be viewed, download, sorted and compared to a company's peers.

XBRL Implementation and Proposed Rules

CalPERS supports satisfying specified preconditions as outlined in the Committee on the Improvement of Financial Reporting's (CIFIR's) Progress Report that the Commission meet prior to requiring the use of interactive data by companies in the filing of its financial reporting. These include successful testing of tagging, the capacity of reporting companies to file interactive data and the ability of the SEC's electronic filing system to provide an accurate human readable and down loadable version of the interactive data.

Although we fully support the requirement to file using interactive data we believe the proposed guidelines do not adequately address the coordination of tagging

between U.S. GAAP and International Financial Reporting Standards (IFRS). We are concerned that the current path does not address convergence of one global accounting standard and the need to coordinate taxonomies consistently mapped between US GAAP and IFRS. It is important to appropriately sequence the reporting requirement, tagging of data, defining of taxonomies with the implementation of convergence.

The proposed rule outlines phased-in reporting by size and if rules are adopted the first required submissions of financial reporting using XBRL would be for the periods ending on or after December 15, 2008. This equates to approximately 500 companies. One concern on the limited number of companies filing initially is whether this addresses the “network effect” so users of financial reporting obtain the benefits of interactive data in peer comparisons.

The problem with having third parties independently prepare financial reporting information in interactive format is the same problem we currently have in using an aggregator, third party distributor; which includes omission, distortion or homogenizing of data. By requiring companies to file interactive data format there is implied accountability and rigor by the company which should improve accuracy, transparency, and comparability.

Registration Statements Covered by the Proposed Rules

CalPERS believes as interactive data becomes integrated into filers’ financial reporting processes and through the efforts of the SEC with XBRL, the next logical step is to require registrants making initial public offerings to provide interactive data. We are cognizant of the importance of the timing of IPO companies going to market, but believe best practice standards should be aspired to as the SEC implements filing requirements of interactive data. Currently XBRL is mandated in China, Korea, Japan and various countries in Europe and the U.S. should continue its efforts in improving financial reporting through the use of interactive data.

XBRL Assurances

CalPERS supports the assurance by auditors initially on the selection of the correct taxonomy, the company has not added extensions that are unreasonable so as to reduce the comparability of its financial statements (important reason behind interactive data), and that the audited financial statements have been properly mapped to the XBRL taxonomy.

We agree and support the overview comments received by CIFIr from comments received through June 30, 2008, emphasizing with the improved quality of XBRL data assurance by auditors is an important part of the process

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and use of XBRL. CalPERS encourages the Commission in its efforts to improve financial reporting through the use of interactive data, XBRL and the needed assurance by auditors.

Thank you for considering our comments. If you would like to discuss any of these points, please do not hesitate to contact Mary Morris at 916-795-4129.

Sincerely,

A handwritten signature in cursive script that reads "Dennis A. Johnson".

Dennis A. Johnson, CFA
Senior Portfolio Manager
Corporate Governance

cc: Anne Stausboll, Interim CIO – CalPERS
Eric Baggesen, Senior Investment Officer – CalPERS
Mary Morris, Investment Officer - CalPERS