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financial executives
international

August 1, 2008

Secretary
Securities and Exchange Commission
100F Street, NE
Washington, D.C. 20549-1090

Re: File No. S7-11-08, Interactive Data to Improve Financial Reporting

Dear Secretary:

Financial Executives International (“FEI”) appreciates the opportunity to provide its views on the U.S. Securities and Exchange Commission’s File No. S7-11-08, Interactive Data to Improve Financial Reporting (“XBRL”).

FEI responds to such requests through its technical committees. As a result, I have attached a letter from each of the following committees in response to the proposed rule:

- FEI’s Committee on Corporate Reporting (“CCR”) and
- FEI’s Committee on Finance and Information Technology (“CFIT”).

Thank you again for the opportunity to provide our comments.

Sincerely,

A handwritten signature in cursive script that reads "Christine DiFabio".

Christine DiFabio
Vice President, Technical Activities
Financial Executives International



committee on corporate reporting

August 1, 2008

Secretary
Securities and Exchange Commission
100F Street, NE
Washington, D.C. 20549-1090

RE: File No. S7-11-08, Interactive Data to Improve Financial Reporting

Dear Secretary:

The Committee on Corporate Reporting (“CCR”) of Financial Executives International (“FEI”) appreciates the opportunity to provide its views on File No. S7-11-08, Interactive Data to Improve Financial Reporting (“Proposed Rule”).

FEI is a leading international organization of 15,000 members, including Chief Financial Officers, Controllers, Treasurers, Tax Executives and other senior financial executives. CCR is a technical committee of FEI, which reviews and responds to research studies, statements, pronouncements, pending legislation, proposals and other documents issued by domestic and international agencies and organizations. This comment letter represents the views of CCR, and not necessarily those of FEI or its members individually.

While CCR is supportive of the U.S. Securities & Exchange Commission’s (“SEC” or the “Commission”) initiative to use interactive data to improve financial reporting, we believe there are some important aspects to the specific requirements that should be refined or eliminated. Since several members of CCR represent companies that participate in the Commission’s Voluntary Filer Program (“VFP”), we believe our organization has unique background that provides a solid foundation from which to comment on the proposed rule regarding Interactive Data.

Vendor Support and Readiness

Given our member’s experiences in the VFP, we have concerns related to the readiness of third-party service providers, including software vendors, in adequately supporting the increased number of filers as XBRL is phased in. This is primarily a concern in the second year of the current phase-in approach when detailed tagging of footnotes and schedules would be required, as currently proposed. Many of the filings that have been submitted to date as part of the VFP have required significant input and assistance from third-party

service providers, and companies will likely continue to need similar assistance in working with the new taxonomies, detailed tagging of footnotes and updated software tools. Although we believe that the situation will naturally be remedied over time we have concerns as to whether such a level of service will be possible as additional filers are required to adopt XBRL, especially in year two as noted above.

Additionally, we have concerns about the proposed timeline of implementation. Newer versions of software have only recently been made available on the marketplace and it is our belief that these will require further testing to evaluate performance issues. For example, there continues to be an issue with the rendering of block tagged footnotes, which – as proposed – would be required for certain filers in just a few short months. Current tools do not always mirror the traditional filings and we are aware that such rendering must be identical in “all material respects”. We agree that only through the use of the technology will such issues be brought to light, but we also wish to ensure that registrants are not unfairly penalized during this period. We believe the effective dates provided in the proposed rule, coupled with next generation XBRL software tools that have only recently been released, could ultimately lead to results that are adverse to the successful adoption of Interactive Data.

Effective Date and Timing Requirements

We have reservations about the proposed effective date and timing of the new requirements. Those areas of concern deal with the initial effective date; the limited use of the 30 day grace period; the use of “amended” filings; and the timing of the phase-in for detailed tagging of footnotes and schedules. We believe that by considering these concerns the Commission will be better able to tailor a final rule that will ensure the successful implementation and acceptance of Interactive Data on behalf of filers.

- We suggest that the rule should be effective for filings of fiscal years beginning after December 15, 2008. This would provide companies the opportunity to file three Form 10-Qs in XBRL format prior to having to prepare a Form 10-K filing. This approach would be consistent with when the Commission initially adopted the electronic filing requirements. This was also the approach that most companies followed when initially participating in the VFP. It allows for a logical progression from the condensed financial statements of a Form 10-Q to the more comprehensive Form 10-K. This is especially true when considering detailed tagging of footnotes and schedules.
- We suggest that the 30-day grace period currently proposed for the initial filing of XBRL documents be extended to all filings during the initial year of the phase-in period. This suggestion is based on our member companies’ involvement in the VFP. Participants of the program, with very few exceptions, do not currently provide XBRL documents concurrent with their actual submissions. It is important to note that most of these filings were completed using the original, less developed, less complex taxonomy, tagging only the financial statements and not the footnotes. The creation of XBRL documents is currently a “bolt-on” or additional step in the

financial reporting process and the concurrent filing requirements (following the proposed initial grace period) will likely result in most companies having to delay the actual filing of their 10-Qs and 10-Ks until the XBRL “bolt-on” process is complete. Additionally, we propose the Commission continue to monitor the adoption of Interactive Data, specifically as it relates to software and integration into the financial reporting process, and allow for a short, but reasonable grace period for the filing of Interactive Data as long as the creation of XBRL instance documents continues to be a “bolt-on” process.

- We also suggest that the rule allow for filings during any grace period to be filed via a Form 8-K or Form 6-K, rather than through an amendment to a previous filing. Whether warranted or not, there is a negative stigma attached to an amended filing; amended filings are usually associated with errors in the original filing. Further, XBRL tagging will be transparent to the user, who may be confused as to the basis for the amendment or the volume of amendments filed by public companies who are XBRL filers.
- We suggest that the detailed tagging of footnotes and schedules be delayed until the third year of a company’s filings vs. the second year as currently proposed. We are supportive of the requirements that each footnote or schedule be tagged as a block of text. However, the initial detailed tagging of footnotes and schedules will require substantial effort from filers, and there is concern that companies may need to perform this function twice, using two separate taxonomies (U.S. GAAP & IFRS), as the movement toward International Financial Reporting Standards accelerates. Additionally, as discussed above, based on our member companies’ experiences, the detailed tagging of footnotes and schedules is one area in particular where software and third-party service providers need to focus their development efforts.

Footnote Tagging Requirements

The following two suggestions address our key areas of concern related to the four levels of detailed tagging of footnotes as enumerated in the proposal:

- We suggest that the level (iii) tagging requirement that each table within each footnote be tagged as a separate block of text be eliminated. As proposed each amount within a table would appear within three separate tags: within the footnote tagged as a single block of text (level i); each table tagged as a separate block of text (level iii); and each amount would be separately detail tagged (level iv). Currently, there is disparity amongst filers as it relates to the presentation of tables within footnotes. Additionally, the taxonomy, in its current version, does not have standard table text block elements. Therefore, filers will need to extend the taxonomy to create elements to tag each table within each footnote as a separate block of text. By extending the taxonomy, comparability amongst filers diminishes. As such, there would be an excessive burden on the preparer to extend the taxonomy to tag each table within each footnote as a separate block of text while providing minimal value to the end user.

- We suggest that the requirement within level (iv) to separately tag each narrative disclosure required to be disclosed by U.S. GAAP (or IFRS as issued by the IASB, if applicable) and Commission regulations be eliminated, as this requirement substantially duplicates the tagging requirements of (i), (ii), and (iii). We feel that this requirement will require significant effort while also causing confusion amongst filers. We support the level (ii) requirement to tag each significant accounting policy within the significant accounting policies footnote as a separate block of text as well as the individual amounts required within level (iv). As such we feel that the requirement that each narrative disclosure required to be disclosed by U.S. GAAP (or IFRS as issued by the IASB, if applicable) and Commission regulations be separately tagged provides minimal incremental benefit to investors while greatly burdening preparers.

Audit Requirements

We concur with the Commission's position that Interactive Data submissions not require an audit opinion and additionally that auditors would not be required to apply AU Sections 550, 722, or 711 to either the Interactive Data submission or the viewable Interactive Data. XBRL as it relates to financial reporting in the United States is in its infancy and will continue to evolve over time. We believe that any audit requirements at these early stages would hamper both the implementation and acceptance of Interactive Data.

Additional Comments

Additionally, we request that the Commission clarify the following issues as part of the final rule:

- That Interactive Data Exhibits submitted to the Commission are deemed as furnished and not filed for liability purposes.
- That internal controls as they relate to the creation, review, and filing of Interactive Data Exhibits are not subject to the requirements of Section 404 of the Sarbanes-Oxley Act of 2002.
- Wording inconsistencies between the proposal and the XBRL U.S. GAAP Taxonomy Preparers Guide relating to the labeling of tags need to be eliminated. Currently, the proposal states that "wherever possible" preparers should change the label of financial statement line items that are definitionally the same as the standard tag. However, the XBRL U.S. GAAP Taxonomy Preparer's Guide states that changes "are permitted by not required".

In conclusion, though we support the Commission's efforts to advance Interactive Data, we believe it is extremely important that the Commission address the factors detailed above to ensure a successful implementation, acceptance and use of Interactive Data going forward. Additionally, we believe the Commission's willingness to continually monitor the phase-in

and implementation of the final requirements, and amend timing accordingly is critical to successful use of Interactive Data as well. We thank you for the opportunity to comment on the proposed rule and are available to discuss our comments at your convenience. Please contact Christine DiFabio, FEI Vice President, Technical Activities at 973.765.1071 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Arnold Hanish". The signature is fluid and cursive, with a large initial "A" and a long horizontal stroke extending to the right.

Arnold C. Hanish
Chair, Committee on Corporate Reporting
Financial Executives International



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committee on finance and information technology

August 1, 2008

Secretary
Securities and Exchange Commission
100F Street, NE
Washington, D.C. 20549-1090

RE: File No. S7-11-08, Interactive Data to Improve Financial Reporting

Dear Secretary:

The Committee on Finance & Information Technology (“CFIT” or “Committee”) of Financial Executives International (“FEI”) appreciates the opportunity to provide its views on File No. S7-11-08, Interactive Data to Improve Financial Reporting.

FEI is a leading international organization of 15,000 members, including Chief Financial Officers, Controllers, Treasurers, Tax Executives and other senior financial executives. CFIT is a national technical committee of FEI which sets the agenda for and drives the dialogue at the intersection of technology and the finance function, both internally to organizations and externally as it relates to agencies, compliance activities, industry trends and users, such as investors. Several members of our committee represent companies that participate in the Voluntary Filing Program of the U.S. Securities and Exchange Commission (“SEC” or “Commission”). We believe this background and experience provides a solid foundation to comment on the proposed rule regarding Interactive Data. This comment letter and the attached document represent the views of CFIT, and not necessarily those of FEI or its members individually.

CFIT is supportive of the use of interactive data to improve financial reporting. In CFIT’s November 9, 2007, letter (attached), the Committee made three recommendations with respect to XBRL:

- Establish quality control systems for XBRL taxonomy updates tied to accounting standards updates;
- Converge the XBRL architecture and implementation approaches for International Financial Reporting Standards (IFRS) and U.S. Generally Accepted Accounting Principles (GAAP) into a single XBRL platform; and
- Develop a common compliance information platform.

CFIT would now like to build on these recommendations with comments on specific questions asked in File No. S7-11-08.

Submission of Financial Information Using Interactive Data

We believe the current XBRL taxonomy is the best interactive data format available for U.S. GAAP filings with the SEC. However, the current taxonomy must be maintained and evolve with accounting rules, reporting changes and standards convergence in order to maintain relevance. Maintenance procedures should be coordinated with the standard setters, and include timelines from exposure to adoption. In addition, the interactive data taxonomy must also evolve with the XBRL specification which will be updated as technology advances are integrated.

There are numerous countries (including Australia, New Zealand and The Netherlands) that have sponsored “Standardized Business Reporting” initiatives, where government agencies use common data and interactive data standards as a means to reduce corporate compliance costs and complexities across a broad range of government agencies. We strongly encourage the SEC to consider a similar initiative as a way to improve financial reporting.

Accuracy and Reliability of Interactive Data

CFIT is supportive of adopting rules that require filers to submit financial statements to be provided in interactive data format as outlined in Section B of the proposed ruling. We also recommend that it be permissible for companies to accelerate compliance with phase-in rules if they already provide that level of detail in their instance document or if they have the desire to adopt before the due dates.

We support the requirement to use existing electronic formats currently used in filings and viewable interactive data using the SEC’s Website as part of the official filing. In terms of rendering (presenting) XBRL submissions, the basic requirement is to ensure the version used in the existing electronic format is the same as the furnished XBRL submission. This process is currently being performed by over 75 companies participating in the SEC’s Voluntary Filing Program (“VFP”). The basic requirement for filers should be to ensure that XBRL tagged information included in the exhibit is the same as the actual filing in the existing electronic format.

CFIT recognizes that XBRL International is in process of updating the specification to include a new specification called Inline XBRL, which will render the instance document in a format consistent with existing electronic submissions. Software companies are also building capability to render the instance document into a more readable format. These efforts are still in the early stages and would not warrant adding requirements in the proposed ruling beyond our recommendation.

Phase-in under the Proposed Rules

The following three suggestions address our key areas of concern related to the phase-in aspects of the proposal. We believe that by considering the following items, the Commission will be better able to tailor a final rule that will ensure the successful implementation and acceptance of Interactive Data on behalf of filers.

- We suggest that the rule should be effective for annual and interim filings of fiscal years beginning after December 15, 2008. This would provide companies with the opportunity to file three Form 10-Qs in XBRL format prior to having to prepare a

Form 10-K filing. This approach would be consistent with that used when the Commission initially adopted the electronic filing requirements. This was also the approach that most companies followed when initially participating in the VFP. It allows for a logical progression from the condensed financial statements of a Form 10-Q to the more comprehensive Form 10-K. This is especially true when considering detailed tagging of footnotes and schedules.

- We suggest that the 30-day grace period currently proposed for the initial filing of XBRL documents be extended to all filings during the initial year of the phase-in period. This suggestion is based on our members' company's involvement in the VFP. Participants of the program, with very few exceptions, do not currently provide XBRL documents concurrent with their actual submissions. Additionally, 10-Q and 10-K filings could be delayed because XBRL is typically a "bolt-on" process and companies would have to delay their actual filings until the XBRL "bolt-on" process is complete.
- We also suggest that the rule allow for filings during any grace period to be filed via a Form 8-K or Form 6-K, rather than through an amendment to a previous filing. Whether warranted or not, there is a negative stigma attached to an amended filing; amended filings are usually associated with errors in the original filing.

International Financial Reporting Standards (IFRS)

We encourage the SEC to facilitate the market development of a more robust and complete IFRS Taxonomy that addresses commonly reported footnote disclosures as well as unique disclosures for specific industry sectors. The updated EDGAR Filer manual should be made available for market review and comment as soon as practical.

In addition to a more robust and complete IFRS Taxonomy, the Commission may want to consider additional resources to facilitate convergence to IFRS GAAP including:

- an explicit mapping between the U.S. GAAP and IFRS GAAP Taxonomies to highlight those common disclosures that are similar as well as those that are not;
- an "open source" reference linkbase for resources of relevance to IFRS convergence processes; and
- case studies of internal corporate process implications, leveraging the enhanced transparency and automation enabled by XBRL, which could be useful in accessing, aggregating and analyzing internal information relevant to IFRS convergence.

Given that many multi-national companies will be required to file both IFRS and GAAP financial statements in XBRL format for some time period, we would hope that the filing technologies will converge, as well as the accounting standards.

Use of Corporate Websites

As technology continues to advance, use of corporate websites provide a cost-effective way for providing information to investors. Incorporating interactive data in corporate websites will enable investors to have easy access to financial information. CFIT encourages companies to use interactive data to provide a tiered approach to deliver such corporate information to decrease the complexity of information presented to benefit of

investors. We also encourage the posting of instance documents and supporting files that will help explain the instance documents, such as taxonomy files and linkbases.

Thank you for your consideration. The committee would be happy to discuss these recommendations in more detail at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Shultz", with a long, sweeping flourish extending to the right.

Robert Shultz
Chair, Committee on Finance & Information Technology
Financial Executives International

cc:

Financial Accounting Foundation

Attn: Teresa S. Polley

Financial Executives International

Attn: James J. Abel

FEI Committee on Corporate Reporting

Attn: Arnold Hanish

International Accounting Standards Committee Foundation

Attn: Olivier Servais

XBRL-US

Attn: Mark Bolgiano

XBRL-International

Attn: Michael Ohata



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committee on finance and information technology

November 9, 2007

Ms. Nancy M. Morris
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

RE: File No. S7-20-07

Dear Ms. Morris:

The Committee on Finance & Information Technology (“CFIT”) of Financial Executives International (“FEI”) desires to comment on the Commission’s Concept Release on IFRS, File Number S7-20-07. These comments are directed at technology implications of the release and should be read in conjunction with CFIT’s August 14, 2007, XBRL position paper sent to the Commission.

FEI is a leading international organization of 15,000 members, including Chief Financial Officers, Controllers, Treasurers, Tax Executives and other senior financial executives. As a national technical committee of FEI, CFIT sets the agenda for and drives the dialogue at the intersection of technology and the finance function, both internally to organizations and externally as it relates to agencies, compliance activities, industry trends and users, such as investors. This document represents the views of CFIT and not necessarily those of FEI, or its members individually.

Accounting Standards and Taxonomy Harmonization

While our response focuses on the technology principles concerning interactive data, CFIT is in support of a single set of high quality global accounting standards. Changes in accounting standards, disclosures and accounting presentation will have a direct impact on XBRL taxonomies, which should be included in an integrated standard-setting process.

We recommend putting quality control systems in place to deliver an updated IFRS and/or U.S. GAAP taxonomy in conjunction with the annual standards update, similar to the process adopted by the trustees of the International Accounting Standards Board (IASB).

The recent announcement regarding the completion of U.S. GAAP taxonomies by XBRL-US provides an opportunity to focus on converging IFRS and U.S. GAAP XBRL taxonomies into a single taxonomy “platform”, to ensure duplicate technology platforms

are not created. The use of the term “platform” recognizes that potential reporting frameworks could be different (i.e., SEC filings versus United Kingdom filings). However, the taxonomy architectures, relevant reporting concepts, and preparer guidance, particularly with respect to extensions, could be appropriately aligned.

We believe that there may be a larger convergence opportunity beyond the convergence of U.S. GAAP and IFRS GAAP. As evidenced by the “National Taxonomy Project” in the Netherlands, the “Standardized Business Reporting” Project in Australia, and the U.S. FFIEC “Call Report Modernization Project,” we believe that preparers and their constituents can benefit from a more business-centric compliance model, in which reconciled taxonomies are used by a wide range of governmental agencies such as the Internal Revenue Service, Department of Commerce, and other industry specific regulatory agencies (such as the Federal Energy Regulatory Commission). This business-centric approach relies upon a common compliance information platform leveraging these taxonomies.

Over 100 countries have adopted IFRS as their accounting standard. The internet and technology continues to drive business opportunities and globalization. Adoption of a single set of accounting standards will reduce the cost of accounting compliance, simplify integration of acquisitions and enable streamlined consolidations of international subsidiaries. From an investor’s point of view, the ability to analyze, comprehend and compare financial statements, irrespective of the country of origin, provides expanded opportunities for investors.

Members of CFIT have and are willing to continue to play an active role in actions and recommendations listed in this letter. Thank you for your consideration. The committee would be happy to discuss these points in more detail at your convenience.

Sincerely,



Taylor Hawes
Chair, Committee on Finance & Information Technology
Financial Executives International

cc:

Financial Accounting Foundation
Attn: Teresa S. Polley

Financial Executives International
Attn: Michael P. Cangemi

FEI Committee on Corporate Reporting
Attn: Arnold Hanish

International Accounting Standards Committee Foundation
Attn: Olivier Servais

XBRL-US

Attn: Mark Bolgiano

XBRL-International

Attn: Michael Ohata