

July 7, 2008

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

Re: Proposed Rule on Interactive Data
File Number S7-11-08

The purpose of this letter is to provide comments on the SEC's proposed rule on interactive data. National City Corporation is a large accelerated filer with a market capitalization of less than \$5 billion. As such, we would be subject to the SEC's proposed rules on interactive data for fiscal periods ending after December 15, 2009.

We have been considering joining the voluntary filing program even prior to the SEC's proposed rule. Over the past year, we have had discussions with software providers, our financial printer and other participants in the voluntary filing program to develop a plan as to how we would go about implementing interactive disclosures. Earlier this year, we reviewed and provided comments on XBRL US GAAP Taxonomy Preparer's Guide and the Banking taxonomy. We were pleased to see that many of our recommendations were incorporated into the final taxonomies issued in late April.

Overall, we support the SEC's interactive data initiative as we believe most financial statement users will find this information useful. However, we have some concerns with the scope and timing of this initiative which are discussed further below.

A. Submission of Financial Information Using Interactive Data

We agree that the SEC should adopt rules that require each registrant's financial statements to be provided in interactive format using XBRL. Without such a rule, a limited number of registrants would voluntarily provide this supplemental data. Interactive data will create new ways for investors, analysts and others to access and use financial data. However, financial statements should continue to be filed in the traditional format, particularly since not all elements of a filing will be accessible via interactive data.

From a preparer's standpoint, we do not believe that interactive data will result in efficiencies or cost reductions in our reporting process. We plan to perform the tagging internally rather than outsourcing this effort to a third party. Accordingly, the proposed interactive disclosures will create an incremental step in our current filing process. We expect that a significant amount of effort will be needed to tag the key elements in our first interactive filing. However, subsequent filings should be much simpler. We expect

to incur a modest increase in fees from our financial printer for their services in validating and filing this additional data.

With a near term mandate to provide interactive data, demand for XBRL software, tools and training should increase significantly. Providers of software are more likely to accelerate their offerings with this increased demand.

B. Phase- in Under Proposed Rules

2. Companies and Filings Covered by the Proposed Rules and Phase in

We believe that the proposed timetable for implementing interactive data reporting is somewhat aggressive. The proposed rule will not be finalized for a few months. The software vendors are not currently ready for such a large demand for their services. We have experienced some difficulty in obtaining and installing third party software. We expect that the planning and preparation for our first interactive filing will take some time. The internal staff that will be responsible for our interactive data implementation are the same staff that prepare our SEC filings. Between quarter end and filing deadlines, their efforts are focused entirely on preparing our 10Q. Thus, the time they have available to work on implementing interactive data will be limited to periods after the 10Q is filed and before the next reporting cycle commences.

We feel that the 10K for 2008 may not be the best filing to implement interactive data filings as most registrant's 10K are significantly more complex than their interim filings. For these reasons, we suggest that the implementation of interactive data filings be postponed to financial statements issued after June 30, 2008.

We agree that smaller reporting companies and foreign private issuers should be subject to the same interactive data filing requirements but should be phased-in at a later date.

3. Documents and Information Covered by the Proposed Rules

We agree with the proposal to initially tag each footnote as a single block of text. We also agree with expanding the detail in the second year to show separate tags for each significant accounting policy. However, we do not concur with creating individual tags for each dollar amount, percentage and GAAP disclosure in the footnotes. We estimate that tagging at this level of detail would result in over 2,200 tags in our footnotes and require a significant number of extensions to the standard taxonomy. The more customization that occurs to the standard taxonomy, the less useful this data will be for users who wish to perform comparisons among registrants. This level of tagging would be a significant burden on preparers. Even after the initial year of adoption, we estimate that it would take us roughly 40 hours to detail tag and validate our footnote data. We would have a significant challenge in completing this level of tagging concurrent with the filing of our financial statements. Accordingly, we would recommend only tagging footnotes to level (iii) in the proposed rule.

Alternatively, if level (iv) data tags are required, preparers should be provided more time to develop tags and test their interactive data files. At a minimum, eighteen months time

would be necessary to prepare for these additional disclosures. This additional level of detailed tagging should also commence initially with a 10Q rather than a 10K as interim financial statements typically have fewer disclosures. Additionally, if level (iv) data tags are required, we believe preparers should be able to file their interactive data files at least five business days after the deadline for their financial statements.

If level (iv) data tags are required, we may reconsider our current interim period disclosures which include a significant amount of detail above and beyond what is required for interim financial statements. We would need to reconsider whether the benefit to investors of providing these additional disclosures justifies the additional burden to tag this data.

We would support a proposal to perform interactive data disclosures on MD&A. Each section of MD&A could be block tagged similar to the footnotes, with some level of detailed tagging performed on the numbers and tables. We believe that interactive data disclosures on MD&A would be more useful to investors than detail tagging of data in the financial statement footnotes.

We agree that providing interactive data on earnings releases would be useful information to investors. However, since earnings releases are not required SEC filings, we would suggest that the use of interactive data for earnings releases be voluntary rather than mandatory. Further, we would propose that such interactive data submissions be provided a five business day grace period after filing of the related 8K filing.

We believe that interactive data disclosures for executive compensation should be a voluntary filing program. If interactive data is required for executive compensation, we recommend limiting detailed tagging of data set forth in the Summary Compensation Table and the Grants of Plan-Based Awards Table, as the focus of these tables is on annual compensation. We recommend block tags for the footnotes to these tables. If interactive data is required for additional tables, we recommend that it be limited to the tables required under the proxy rules, with block tags for related footnotes. We do not recommend tagging narrative discussions regarding executive compensation, but, to the extent interactive data is required for narratives, we recommend block tags of narratives, as the form of presentation of this data varies widely among issuers. We do not recommend detailed tagging of individual amounts or percentages in the body of the text, again because the form of presentation of this data varies widely among issuers.

We do not believe that interactive disclosures should be required for financial information in registration statements.

4. Initial Filing Grace Period

We agree with the proposed 30 day grace period for the initial interactive data filings. We believe that this period will be adequate to tag and validate the final financial statements. As discussed above, if detailed tagging is required of footnote data, we believe that a minimum 5 day grace period should be provided. Tagging of the financial statements cannot begin until the financial statements are final. The completion of our

financial statements typically occurs just shortly before the filing deadline which does not leave adequate time to complete the tagging process. We do not feel that the usefulness of the interactive data will be significantly impaired if this data is received five days later than the official filing date.

5. Web Site Posting of Interactive Data

We agree with the proposal that registrants post interactive data on their corporate websites. It would not be a significant burden to add a URL link in our filing to direct users to our corporate website. We already provide such a link in our call reports filed with the regulators.

C. Accuracy and Reliability of Interactive Data

2. Use of Technology to Detect Errors

We agree that interactive data should be deemed not filed for purposes of Sections 11 and 12 of the Securities Act and excluded from the officer certifications required by Exchange Act Rules 13a-14 and 15d-14. We agree that the viewable interactive data disclosures should have the same potential liability as the corresponding portions of the traditional format of the filing. This standard will ensure that preparers review their interactive data disclosures before submission for accuracy and consistency. However, we suggest that a one year grace period be provided to allow for further review and testing of interactive data before liability attaches to this supplemental data. We do not feel that auditors should be required to give assurance on interactive data disclosures.

4. Continued Traditional Format and Interactive Data Cautionary Disclosure

We agree that financial statements should still be filed in the traditional format. Not every user may wish to utilize interactive data. We agree with the proposal to eliminate the cautionary language on interactive data since such data will be filed as an exhibit to the financial statements.

D. Required Items

1. Data Tags

We agree with the proposal that comparative data from prior periods should be tagged. We also concur with the proposal that users would be given advance notice when a new release of the taxonomy is forthcoming and ample time to update their tags. A summary of changes to the taxonomy from the last release would also be helpful to identify changes to the standard taxonomy. We would expect that new tags would be periodically created to address changes in accounting standards and disclosures. If these changes to the standard taxonomy are highlighted to preparers, it would facilitate greater use of new tags among preparers which would enhance comparability.

E. Consequences of Non-Compliance and Hardship Exemption

We agree with the proposed consequences for failure to comply with interactive data submissions. The inability to utilize a short form registration statement should be sufficient incentive to get registrants to comply with the interactive filing disclosures.

We appreciate the opportunity to comment on the SEC's proposed rule on interactive disclosures.

Sincerely,

Susan M. Kinsey

Assistant Treasurer

National City Corporation