August 1, 2008

Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Re: File Number S7-11-08, *Interactive Data to Improve Financial Reporting*

Dear Sir or Madam:

We appreciate the opportunity to comment on the Securities and Exchange Commission's (SEC) proposed guidance. We fully support the SEC's interactive data initiative to improve financial reporting and your commitment to this project. We believe that the proposed rule will enhance accurate, transparent and effective financial reporting.
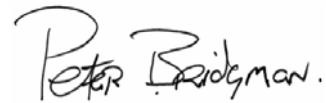
We joined the SEC's voluntary filer program in the first quarter of 2006, and have filed XBRL-compliant core financial statements each quarter since we joined the program. Since our first filing, the ongoing preparation of XBRL documents has been significantly less. In addition, our experience has demonstrated that most of the accounting judgments and XBRL tagging decisions, and the corresponding time and effort, occur mainly during the first filing submission. The time and effort significantly decreases with subsequent filings as the focus on these filings is, for the most part, change-based, with emphasis on new disclosures or the adoption of new accounting pronouncements, which are relatively infrequent.

We believe that in order for XBRL to reach its full potential, there needs to be wide-spread adoption. We additionally believe that the only way to achieve this critical mass in the United States is through mandating this regulation.

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We appreciate the opportunity to express our views and would be pleased to discuss our comments or answer any questions that you may have. Please do not hesitate to contact me at (914) 253-3406.

Sincerely,

Peter A. Bridgman

cc: Indra K. Nooyi, Chairman of the Board of Directors and Chief Executive Officer
    Richard Goodman, Chief Financial Officer
    Marie T. Gallagher, Vice President and Assistant Controller
    Keith Mayer, Director of External Reporting