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July 10, 2008

Ms. Nancy M. Morris, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

By e-mail to rule-comments@sec.gov, File Number S7-11-08

Subject: **Proposed Rule regarding the use of Interactive Data to Improve Financial Reporting**

Dear Ms. Morris:

United States Steel Corporation (U. S. Steel) is pleased to have the opportunity to comment on the subject proposed rule. In general we believe that the Commission is underestimating the complexity and cost of providing interactive data and may be overestimating the benefits to investors, particularly individual investors.

Following are responses to a number of the questions asked in the proposed rule.

Should we adopt rules that require each filer's financial statements to be provided in interactive data format? If we do so, should we include a phase-in period or temporary exception for detailed tagging of the financial statement footnotes? Should schedules to the financial statements be tagged? What are the principal factors that should be considered in making these decisions? Is it useful to users of financial information to continue to have, in addition to interactive data, duplicate, human-readable financial statements in ASCII or HTML format?

We believe that a phase-in period for detailed tagging of the financial statement footnotes is necessary to ease the initial burden that companies will face. We also believe that it will be necessary for users to continue to have human-readable financial statements in addition to interactive data. Interactive data, at best, is only one part of investment analysis and decision making. Many material facts are not quantifiable in the manner contemplated. We do not expect the majority of users (especially individual investors) to immediately embrace the use of interactive data.

Do commenters agree that compared to reports using ASCII and HTML, interactive data would require less manually-transferred data? If so, do commenters believe that the proposed rules would result in less human error and therefore contribute to reduced costs?

We agree that reports using interactive data that has been filed would require less manually-transferred data, but the filing of that data in interactive format creates the opportunity for more human error on the part of the companies filing that data. Additionally, it significantly increases the cost of their filings.

Is the XBRL format for interactive data sufficiently developed to require its use at this time with regard to both US GAAP and IFRS as issued by the IASB? If not, what indicators should we use to determine when it has become sufficiently developed to require its use?

This is difficult to comment on because there is very little interactive data available to test. We believe that it would be helpful to filers, interactive software developers and any other interested parties if much more interactive data was available to view and compare using the various rendering devices. Since the new taxonomy has been available, most test filers are still tagging only the financial statements. We believe that it would be helpful to require more standardization of the classification of items on the financial statements because this would help to simplify the tagging process and limit the number of company-specific tags.

Should we delay the first required interactive data submissions until the second half of 2009 or later? What benefits would there be to advancing or delaying implementation of the proposed rules? How much lead time do large accelerated filers need to familiarize themselves with interactive data and the process of mapping financial statements using the list of tags for U.S. financial statement reporting or IFRS financial reporting?

We believe that the first required submissions should be delayed until at least the filing associated with the first quarter of 2009. It would be much simpler to prepare a Form 10-Q in interactive data format and would therefore require less time and effort. Furthermore, it would give preparers the opportunity to familiarize themselves with the process before filing the more complicated Form 10-K. In some respects, the timing may be premature if U.S. companies will be required to adopt International Financial Reporting Standards (IFRS) in the next several years. After the adoption of IFRS, companies will have the additional burden of going through the initial tagging process again.

We also believe that delaying the first required interactive data submission would allow third party resources (e.g., financial printers) more time to prepare for the demands of their clients. Many financial printers have been preparing, but do they have all the resources they will need, especially if detailed footnote tagging is required?

Should the initial submission required by the proposed rules be a periodic report? If so, should it be a Form 10-Q for domestic issuers? Would this be an easier report for companies to prepare, or would it be best for companies to begin providing interactive data with respect to the fiscal year end financial statements?

As stated above, we believe that the initial submission should be a Form 10-Q instead of a Form 10-K. It would be much simpler to prepare in interactive data format and would therefore require less time and effort. Furthermore, it would give preparers the opportunity to familiarize themselves with the process before filing the more complicated Form 10-K.

Are the proposed four levels of detail appropriate for footnote tagging? What alternative footnote disclosure items or criteria do commenters recommend we establish for tagging footnotes? Why would those be more appropriate than what we propose?

We suggest that if detailed footnote tagging is required, it should be limited to the more standardized notes (e.g., pensions, taxes) and to the standard tags in keeping with the objective of comparability. Also, it could be very confusing and cumbersome to tag numerical data within a tagged block of text.

Should we require all four levels for footnotes in the first year instead of using the phase-in approach for the more detailed tagging? Should detailed tagging of a filer's footnotes and schedules not be required until more than one year after its initial interactive data submission, for example, in year three or four?

We strongly support the Commission's proposal that detailed tagging of the footnotes should not be required in the first year. We also urge the Commission to study the actual usage of interactive data and solicit comments from users as to how often they accessed the data, how helpful they found this to be as an analytical tool and to provide specific feedback as to which items were useful and which were less useful or useless.

Would the most detailed level of tagging result in the creation of a high number of company-specific extensions? If so, would the additional effort needed to create new extensions diminish once a filer has tagged at this level of detail? Should the tagging requirement instead be only to require detailed tagging to the extent a standard tag already exists in the standard list of tags?

We believe that the most detailed level of tagging would result in an extremely high number of company-specific extensions due to the company-specific nature of the majority of the footnotes. Furthermore, we do not believe that many users would utilize most of this detailed data. As noted above, we suggest that if footnote tagging is required, it should be limited to the more standardized notes (e.g., pensions, taxes) and to the standard tags in keeping with the objective of comparability.

What additional costs and burden would there be with detailed tagging of the financial statement footnotes and financial statement schedules as opposed to "block tagging"?

If filers have to detail tag every monetary value, percentage, and number as well as narratives in every footnote with each filing, this could be burdensome on larger filers. We believe that most filers will utilize financial printers to do their interactive data tagging and detailed tagging of the footnotes will significantly increase the cost. Also, as noted above, because of the company-specific nature of most of the footnotes, detailed tagging of footnotes will result in significant customization.

Would investors and other users of tagged data benefit from the tagging of individual amounts (i.e., monetary values, percentages, and numbers) and narrative disclosures within each footnote together with blocked text?

We do not believe that investors and other users would benefit much from the tagging of all individual amounts because there would be so many company-specific tags that comparability would be compromised. Examples of footnotes for which detailed tagging may not yield much benefit to investors due to the extremity of company-specific detail disclosed include: Segment Information, Acquisitions, Debt, Variable Interest Entities and Contingencies and Commitments. Furthermore, we don't believe that most users would want to access the majority of this data. The effort required to do the tagging would outweigh the benefit to the users.

Should the proposed rules require interactive data submissions for a filer's financial information provided under Form 8-K and 6-K, such as earnings releases or interim financial information? If so, what level of tagging detail would be appropriate, and would a reasonable grace period from the date of the Form 8-K or 6-K to the deadline for interactive data (e.g., one, three, or five days) address concerns that filers require additional time to provide interactive data for such financial information? Does financial information provided under Form 8-K or 6-K, such as earnings releases, present additional burdens compared to other forms that would warrant excluding them from the proposed rules?

We do not believe that the proposed rules should require interactive submissions for financial information provided under Form 8-K. In many cases, this would place an unnecessary burden on filers by requiring a duplication of effort because most of this information would be required to be submitted in interactive format in future periodic filings. If interactive data submissions would be required for Form 8-K's, we believe that a grace period would be appropriate due to the short amount of time allowed for the preparation of these filings.

Should we permit interactive data information to be provided later than the related filing for the first year, rather than just the first filing? Should we provide a grace period for the first filing as to which the issuer is required to tag financial data statement footnotes in detail? Is a grace period not needed?

We believe that it would be helpful to have a substantial grace period for all filings for at least the first year. We also believe that a grace period would be helpful for at least the first filing where detailed tagging of footnotes is required. We suggest that the Commission consider creating a new form (e.g., Form 10-K/X) for the submission of tagged data to eliminate the requirement to file an amended Form 10-K or Form 10-Q, and still allow filers to take advantage of the grace periods.

Should any or all interactive data be encompassed within the scope of officer certifications? Is there any reason to treat interactive data differently from traditional format data in this respect?

We support the Commission's proposal to exclude interactive data from the scope of officer certifications.

Should any or all interactive data be deemed filed for purposes of Section 34(b) of the Investment Company Act and, if so, should it be regardless of compliance with proposed rule 405 or a filer's good faith and reasonable efforts to comply?

We support the Commission's position that all interactive data should be deemed not filed for purposes of Section 18 of the Exchange Act and Section 34(b) of the Investment Company Act.

Should interactive data be subject to liability if a filer does not tag its financial information in a manner consistent with the standards approved by the Commission, irrespective of the filer's good faith effort? If the answer is yes, what should the filer's liability be for such errors, and should liability attach even if the mistake is inadvertent? What if the error is the result of negligent tagging practices, but there was no affirmative intent to mislead?

We suggest that the only grounds for liability relating to tagging be for intentional misconduct.

Should we require the involvement of auditors, consultants, or other third parties in the tagging of data? If assurance should be required, what should be its scope, and should any such requirement be phased in?

We do not believe that interactive data should be subject to audit.

Is our focus on comparability appropriate? Instead of stressing ease of financial statement comparability, should our rules permit greater use of customized data tags?

We believe that the focus on comparability is appropriate. We also suggest that instead of proposing that whenever possible, preparers change the label for a financial statement or footnote element that exists in the standard list of tags to match what is on the face of their financial statement or in their footnote, it may be simpler to require them to change the description on the face of their financial statement or in their footnote to match the label of the existing standard tag. This would enhance comparability of the human-readable statements and footnotes as well as simplifying the tagging process.

Should we codify any other principles to encourage comparability without unduly reducing the extensibility of interactive data?

As mentioned above, we believe that requiring more standardization of the classification of items on the financial statements would help to simplify the tagging process and limit the number of company-specific tags.

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We appreciate your consideration of these comments. If you have any questions with respect to our comments, please call Colleen Darragh, Director – External Reporting and Financial Analysis, at 412-433-5606.

Sincerely,

/s/ Larry G. Schultz
Larry G. Schultz
Senior Vice President & Controller