

# VINTAGE FILINGS

A PR NEWSWIRE COMPANY

Via E-mail

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

August 1, 2008

RE: Release No. 33-8924; File No. S7-11-08

Ladies and Gentlemen:

Vintage Filings is pleased to respond to the above-referenced proposed rule on *Interactive Data to Improve Financial Reporting*, specifically regarding whether the first XBRL filing should be on Form 10-K or Form 10-Q.

We note that several commenters have recommended that the first required XBRL filing be a quarterly filing on Form 10-Q, rather than an annual filing on Form 10-K.

We concur with those commenters, and offer an additional reason why the first filing should be a quarterly filing:

Requiring non-accelerated filers to make their first XBRL filing on Form 10-K would essentially negate the purpose of the 30-day grace period for these filers, as a direct result of their filing deadlines. Since non-accelerated filers have 90 days after fiscal year end to submit their 10-K filing, the 30-day grace period for XBRL submission would coincide with the first 30 days (out of 45 total) that non-accelerated filers have to prepare their Form 10-Q after the close of their first fiscal quarter.

Additionally, should a non-accelerated filer need to take advantage of the 15-day extension which may be granted under Rule 12b-25 for the submission of their 10-K, then the 30 day grace period would actually coincide with days 16 to 45 (of 45) of the 10-Q reporting cycle.

Since it has been commented that (generally) the same people would be involved in the preparation of the traditional ASCII/HTML report and in the XBRL filing, the grace period would actually become an additional burden for the preparers and could ultimately jeopardize the accurate and timely reporting of first quarter results.

Thus, requiring a Form 10-K to be the first XBRL submission would place an additional burden on smaller/non-accelerated filers, and would diminish the effectiveness of a grace period relative to larger/accelerated filers.

We thank the Commission for the opportunity to comment.

Sincerely,

Gordon Ruckdeschel  
Vice President  
Vintage Filings, a PR Newswire Company