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Secretary  
Securities and Exchange Commission  
100 F St. NW  
Washington, DC 20549-9303  
[Rule-comments@sec.gov](mailto:Rule-comments@sec.gov)

Release 33-8924, 33-8929  
File Number S7-11-08, S7-12-08

Dear Secretary:

As a finance professor and a personal investor, I am a heavy user of financial statements. I wholeheartedly support the proposals to require financial statements in XBRL as soon as practicable. I similarly support the proposal to require mutual fund risk and return information in XBRL. Once fully implemented, XBRL will save the users of financial statements the countless hours we now spend rekeying or reformatting the current Edgar filings.

I also support the provisions in the releases to limit the liability of issuers for mistakes or delays in the XBRL reporting. As this is a developing technology, there are bound to be lots of implementation glitches. As long as there is no scienter involved, issuers should not be faced with the prospect of liability for technical mistakes during the implementation phase. This will reduce implementation costs significantly: Issuers and their auditing firms will not have to go to Sarbanes-Oxley levels of extremely redundant documentation to cover their legal *derrieres*. As an investor, I would rather have noisier data sooner than wait for perfect data sometime later in the century. And as a shareholder, I want the

companies I own to not have to spend excessive amounts on useless documentation to achieve an unobtainable ideal of perfection.

Implementation costs should fall quickly. Once standard corporate accounting software packages are updated to include XBRL outputs, the cost of generating XBRL filings should be quite small.

I think that the benefits to investors will be particularly large with respect to OTCBB companies. Financial statements for such firms are not usually carried in standard commercial databases. XBRL will dramatically reduce information costs to investors in this realm. It will help these firms by increasing the visibility and usefulness of their financial statements to investors. It will also reduce fraud in this area by making it easier for investors to look up and analyze the financial statements of OTCBB firms. For this reason I support rolling out XBRL as quickly as practicable for such firms. However, OTCBB firms are often quite small and unable to afford major software development efforts. It thus may make sense to make XBRL voluntary for such firms until the cost of automatically generating XBRL reports drops to affordable levels.

Also, I am not certain whether all of the check boxes currently on covers of 10-K and 10-Q filings, such as the shell company box, are included in the mandated list of material in XBRL. Such information is quite useful to investors and should be included in the mandatory tags. Basically, I would like to see all of the required information in the 10-K and 10-Q reports tagged. Similarly, it would be useful to have all mutual fund filings, such as the N-PX forms, in XBRL as well.

Respectfully submitted,

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