



GENERAL MILLS

August 21, 2008

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

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

Dear Secretary:

We appreciate the opportunity to comment on the proposed rule on "Interactive Data to Improve Financial Reporting."

We joined the Voluntary Filer Program (VFP) in April of 2008 by furnishing our quarterly financial statements in XBRL format and will continue to submit XBRL financial statements through the duration of the VFP. This response is based on our experience as a participant in the VFP.

We support the interactive data initiative. We entered the VFP to gain experience with XBRL and to determine what benefits, if any, we would gain from it. Our experience has shown that our investors and the analysts that follow our securities (debt, rating agencies, and equity) have not yet shown much interest in having this information in this form.

We also learned from our participation in the VFP that there are certain elements of available tools that need to be enhanced, including:

- The current taxonomy is less robust for cash flow statement and statement of stockholders' equity tags. Our experience showed that the greatest need for custom tags came from these two statements. The taxonomy also seems to have too many choices for balance sheet and income statement tags.
- At the present, we tag only our financial statements in this format, and believe that prior to tagging footnotes, accompanying schedules and Management's Discussion & Analysis, significant work will be required on the taxonomy to limit the number of custom tags we believe would be required to accurately tag this information. Failure to enhance the taxonomy in these areas will reduce the comparability of information.
- The presentation of the statement of stockholders' equity in interactive data format does not conform to how most registrants currently present the statement – year to date rather than quarterly formatting.
- We are not aware of integrated applications that allow tagging of data at its source and, without intervention, have it flow directly into an XBRL document. We have direct experience with SAP and Hyperion, and explored other options prior to entering the VFP.
- We are not able to tag and furnish in interactive data format a set of financial statements and accompanying notes and schedules on the same date as the required filing. A reasonable period of time must be allowed for the final, filed version of the required filing to be tagged, reviewed, and submitted to the SEC. We would recommend at least a ten business day lag in

the interactive data submission from the required filing. For initial interactive data submissions, we support a 30 to 45 day grace period.

Other specific comments we have on the proposed rule include:

- We support a phased approach to the submissions of interactive data, by requiring financial statements first, and then requiring the footnotes, schedules and MD&A to be submitted at a later date.
- We support the scope of the proposed rule as it relates to other financial information provided under Form 8-K, including earnings releases or interim financial information.
- We do not support including other financial statements, including those provided pursuant to Rules 3-05, 3-09, 3-14, and 3-16 of Regulation S-X, as generally that financial information is likely to be less relevant to the primary users or beneficiaries of interactive data, such that the effort required would be less meaningful.
- We do not support extending interactive data submission requirements to proxy statement information, as based on our experience in the VFP, absent significant improvements in the taxonomy, the comparability of this information would be limited by the number of custom tags required, especially related to Compensation Discussion & Analysis ("CD&A") disclosures. Limiting future tagging to the required tabular information may be a viable longer-term option.
- We support the proposed rule's requirement that third parties such as auditors need not be involved in the creation of interactive data provided as an exhibit to a filer's periodic reports or registration statements. Involving third parties in the interactive data filing process will certainly increase the cost to registrants, potentially significantly, and will also require a further lag between the required periodic filing and interactive data submission, likely more than the ten business days we propose above. This longer lag will also diminish the value of the interactive data to its potential users.

Please do not hesitate to contact me with any questions at 763-764-2760 or rick.lund@genmills.com.

Sincerely,



Richard O. Lund
Vice President, Controller