



2 September, 2008

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

VIA ELECTRONIC MAIL at rule-comments@sec.gov

RE: Proposed SEC Rule on Interactive Data to Improve Financial Reporting File Number S7-11-08

Dear Ms. Morris:

This writing comes in the aftermath of over 60 days of compiled writings by those who volunteered their thoughts in re: the SEC's proposed mandated use of XBRL. This writing is in substantial rebuttal to the arguments advanced by various commenters who argue hardships associated with the forced implementation of XBRL and now prospectively IFRS. Before launching into the substance of this writer's comments, allow me to first commend Chairman Cox who, since August of 2005, has tirelessly and relentlessly enforced legislation promulgated under the Sarbanes Oxley Act of 2002 [hereinafter "SOX"] and continued to "push" for increased corporate governance; that is, the proposed use of XBRL and now more recently IFRS.

Enterprise Compliance International [ECI] is a Minneapolis, Minnesota-based privately held corporate compliance firm offering total compliance solutions to corporate America since the enactment of SOX in July of 2002. Shortly after the enactment of SOX, Big 4 member firms began outsourcing SOX Section 404 audits to ECI both US domestically and globally. SOX was one of the most pervasive mandates ever to hit corporate America. Chairman Cox, in August of 2005, took over the reins from his predecessor and began an intense program to vigorously enforce SOX and thereafter introduced new compliance initiatives; first XBRL and then IFRS.

The first serious move toward XBRL was initiated on May 14, 2008 when Chairman Cox, Commissioners Atkins and Casey unanimously adopted XBRL as a potential near-term mandate beginning as soon as December 15, 2008 for all accelerated corporate filers with public floats in excess of \$5 billion. As a consequence of said 14 May open meeting, Chairman Cox and his commissioners granted a 60 day "comment" period to hear reactions to this proposed rule and potential mandate. In subsequent hearings, more specifically on 27 August, 2008, the scope of interactive data prepared financial statements under XBRL was expanded to potentially include IFRS as a companion mandate. IFRS, should it become mandated, would transition corporate America from a "rules based" US GAAP to a "principles-based" IFRS accounting methodology.

There is a preponderance of evidence now on the “books” cost-justifying both XBRL and IFRS and such evidence is beyond the scope of this writer’s comments. This writing merely wishes to touch upon some of the more prevalent attitudes of the many who commented that it would be in “their” best interests to postpone implementation of XBRL and prospectively IFRS mainly because it is “too costly” and that such “costs materially outweigh the benefits”. **This is patently false-** ECI and its Big 4 member colleagues have substantially populated our Internet with numerous reasons why XBRL and IFRS are not only cost-beneficial but moreover worthwhile implementing much sooner than later. One must ask why 100 countries have all gone through this transition and why the United States is not one of them? In point of fact, **more than 100 countries now permit or have mandated IFRS. All major capital markets have changed.....except the US.** Can all of these countries be wrong? I think not.

Now let us look to some of the comments which complain of the costs for software; more specifically, one commenter’s statement that the costs of a software package allegedly increased **64.8%** after the SEC ruled to adopt XBRL on May 14. While we have no evidence to dispute the claim of the commenter, we can affirmatively state with absolute confidence that our **Excalibur™** solution, which allows a US GAAP or IFRS based system to operate under either HTML or XBRL, is quite moderately priced and underwent no such increase after the decision of the SEC to adopt XBRL. Not only is **Excalibur™** moderately priced, but any user can be “up and running” in a day, once we have concluded an XBRL Readiness engagement. It couldn’t be easier.

In short, there are no reasons to delay implementing XBRL or IFRS, however this commenter urges those intending to implement to do their “homework”. Chairman Cox and his commissioners are urged to reject any such proposed implementation delays in either or both XBRL or IFRS as such delays are not in the best interests of company investors or stakeholders.

ECI is prepared to receive inquiries or comments of those aspiring to move ahead with either or both XBRL or IFRS regardless of any implementation schedule concessions which the SEC may deem appropriate and meritorious, notwithstanding this writing.

Respectfully,



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