



# WELLPOINT.

120 Monument Circle  
Indianapolis, IN 46204

July 25, 2008

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

Re: Proposed Rule – Interactive Data to Improve Financial Reporting  
File No. S7-11-08

Dear Sir or Madam:

We appreciate the opportunity to comment on the Securities and Exchange Commission's, or Commission's, proposed rule, *Interactive Data to Improve Financial Reporting* (File No. S7-11-08, Release No. 33-8924), and commend the Commission for its continuous effort to improve financial reporting. Due to a number of concerns, which we outline below, we believe the proposed requirements to provide limited amounts of interactive data will not provide cost effective benefits to either investors or listed companies. We also believe there are certain risks with the proposed rule, both from an investor point of view and a registrant's perspective. We are suggesting the Commission not enact the proposed rule to require submission of eXtensible Business Reporting Language, or XBRL, interactive data at this time and submit the following views for your consideration.

Given the Commission's emphasis on transparency in the presentation of financial data, we believe providing only the financial statements and notes in XBRL segregates a portion of the overall reporting package now presented in registrants' quarterly and annual filings. We believe it is important for anyone reviewing a company's financial position to review all sections of the filing, including the Risk Factors and Management Discussion and Analysis, to provide a complete understanding of a company's operations, liquidity and financial condition.

From WellPoint's perspective, we do not see added value for our current shareholders if we were to provide the interactive data specified in the proposed rule. Similar to other large corporations, our securities are held by a number of large institutional investors, who have developed various proprietary models for analyzing company performance. We do not believe providing XBRL data will assist them in their analysis. We also believe providing XBRL data will not assist individual investors who may be considering the purchase of WellPoint stock, as the analysis of interactive data without background or overall knowledge of the company does not provide a sufficient basis for an informed investment decision. This lack of certain critical qualitative information could actually lead to riskier investment decisions as potential investors aggregate data based primarily on quantitative information.

In addition, the recent roundtable discussions held by the Commission which led to strong support for a single set of high quality global accounting standards, as well as the recent convergence projects between the Financial Accounting Standards Board, or FASB, and the International Accounting Standards Board, or IASB, indicate an impending move to International Financial Reporting Standards, or IFRS, for all registrants. In our opinion, it would be in the best interest of all parties to postpone the discussion of implementing XBRL until IFRS are universally applied and the final taxonomies for IFRS are developed. We expect both of these to occur within the next three to five years.

If interactive data is required to be provided by a company, we believe all interactive data whether viewable or non-viewable, should be excluded from the scope of officer certifications and be deemed "furnished," not "filed." In our opinion, subjecting viewable data to the same degree of liability currently experienced with traditional filings will require officers to put undue reliance on third party software that is out of a company's control. Given the volume of the current U.S. GAAP taxonomy (approximately 15,000 items), we believe there is potential for misclassifications or errors to occur. We would recommend a cautionary disclosure or "safe-harbor" statement that links the interactive data to the traditional filings, similar to the disclosure currently used in the voluntary program.

While certain registrants may eventually integrate XBRL data in their overall internal reporting process, we believe the number of companies electing to do this will be limited. We believe XBRL will not provide value in managing a company's operations or provide added benefit to internal reporting. We anticipate the processing of interactive data will be an additional cost add-on to most individual companies' reporting process, perhaps being completed by a third party vendor. We do not see significant opportunity for synergies with a company's internal reporting system.

It is also our opinion that if interactive data is required to be available for downloading, it should be available from the Commission's website and not individual company websites. The time and cost required for users to access interactive data would not increase as a result of going to the Commission's website to download the data. Many companies currently have a hyperlink on their website to comply with today's internet requirements. As the proposed rule is currently written, a company would not be allowed to offer a hyperlink to get to the XBRL data. It seems this would require additional programming and cost by a company to provide the necessary XBRL data. We believe a company should have the ability to reference the Commission's website for access to interactive data.

In summary, it is our recommendation that the Commission not implement this proposed rule at this time due to the various risks and costs outlined above. We believe it would be in the best interest of all parties to postpone the discussion on interactive data reporting until final decisions have been made regarding IFRS adoption by all registrants. We also believe providing interactive data may not present a complete picture of a registrant's financial risk, which could be to the detriment of investors.

Finally, should the Commission move forward with this proposed rule and require the submission of XBRL data, we request the Commission reconsider the timing of implementation of this rule. Given that the final rule will likely not be issued until the latter portion of 2008, this will not allow sufficient time for implementation at December 31, 2008. We would also request the Commission reconsider its view on the use of interactive data and its "filed" status as compared to being "furnished."

If we may be of assistance in answering questions which may arise in connection with this letter, please call me at (317) 488-6770.

Very truly yours,

A handwritten signature in black ink, appearing to read "Wayne S. DeVeydt", with a long horizontal line extending to the right.

Wayne S. DeVeydt  
Executive Vice President and  
Chief Financial Officer

Copy to: Angela F. Braly  
President and Chief Executive Officer

John E. Gallina  
Vice President, Chief Accounting Officer  
and Chief Financial Officer, Comprehensive Health Solutions

Ernst & Young LLP