

6 April 2008

Mr. Mark Bolgiano
President and CEO
XBRL US, Inc.
1050 Connecticut Ave NW, Suite 400
Washington, DC 20036-5339

Re: Public Review of US GAAP Taxonomy and Preparers Guide

Dear Mr. Bolgiano:

The CFA Institute Centre for Financial Market Integrity (CFA Institute Centre),¹ in consultation with the CFA Institute XBRL Working Group (WG)², appreciates the opportunity to comment on the newly developed US GAAP Taxonomy (UGT) and related Preparers Guide (PG) as part of their contract with the U.S. Securities and Exchange Commission (SEC or Commission).

The CFA Institute Centre represents the views of its investment professional members, including portfolio managers, investment analysts, and advisors, worldwide. Central tenets of the CFA Institute Centre mission are to promote fair and transparent global capital markets, and to advocate for investor protections. An integral part of our efforts toward meeting those goals is ensuring that the quality of corporate financial reporting and disclosures provided to investors and other end users is of high quality. The CFA Institute Centre also develops, promulgates, and maintains guidelines encouraging the highest ethical standards for the global investment community through standards such as the *CFA Institute Code of Ethics and Standards of Professional Conduct*.

¹ The CFA Institute Centre for Financial Market Integrity is part of CFA Institute. With headquarters in Charlottesville, VA, and regional offices in New York, Hong Kong, and London, CFA Institute is a global, not-for-profit professional association of more than 94,000 investment analysts, portfolio managers, investment advisors, and other investment professionals in 133 countries, of whom 82,000 hold the Chartered Financial Analyst® (CFA®) designation. The CFA Institute membership also includes 135 member societies in 56 countries and territories.

² The objective of the WG is to develop guiding principles related to XBRL and thereby form the basis of our future advocacy for and promotion of XBRL usage. Additional information on the WG is available on the CFA Institute website:
<http://www.cfainstitute.org/centre/overview/councils/xbrl/index.html>

Re: Public Review of US GAAP Taxonomy and Preparers Guide
6 April 2008
Page 2

Introduction

CFA Institute Centre formed its WG in 2007 as a voice for the investor in the development and implementation of XBRL. The volunteer members of the WG represent varying backgrounds in investment and analytical practices. All members of the WG share a common desire to improve the quality and access to financial information for all investors.

To assist in providing feedback to regulators and others promoting the use of XBRL programs, the WG developed the following guiding principles:

1. Core taxonomy (or structure of tagging elements) should be predefined by current financial reporting standards, including generally accepted accounting principles and other regulatory disclosure and reporting requirements.
2. Taxonomy extensibility should maintain the level of data comparability as defined by GAAP and other regulatory requirements.
3. Ultimately, companies should deliver required financial reports to regulators using the established XBRL framework.
4. The general public should have equal access to the XBRL-tagged information.
5. Regulators should develop the necessary infrastructure and protocol to ensure the timely updating of the established XBRL framework as outlined in the preceding four key principles.

These principles provide an outline for XBRL frameworks, which in turn create many benefits for investors (see Appendix I for further elaboration on these principles).

We applaud the steps taken by XBRL US in creating the UGT and the related PG. These documents are major steps in moving forward the SEC's interactive data project and achieving the WG principles. The balance of our letter discusses our principles and related concerns with the PG and UGT.

Expectations for XBRL Frameworks

An initial objective of the WG was to conduct a survey of the CFA Institute membership on the topic of XBRL. A survey of nearly 10,000 members believed to be primary users of company financial reports (based on their self-identified investment practice in their membership profile), was conducted in 2007 with a 9 percent response rate.³

³ Full survey results are available on the CFA Institute website:
<http://www.cfainstitute.org/centre/topics/reporting/xbrl/topline.html>

The results of two survey questions confirmed earlier CFA Institute surveys⁴ regarding the average level of importance members placed on company filings and their different sections. Outside of the primary filings and financial statements, the average degree of importance respondents placed on quarterly earnings releases was 3.9 out of 5, and they assigned on average 4.1 out of 5 on the MD&A section.

	2007	2003	1999
Question 6: On a scale of 1 to 5, please indicate the level of importance that each of the following source documents has to your analysis and evaluation of a company's financial condition and performance.	N = 853		
Annual reports – e.g., 10K filings	4.6	4.4	4.0
Interim reports – e.g., 10Q filings	4.1	4.2	3.9
Quarterly earnings releases	3.9	4.1	3.9
Other regulatory filings*		3.9	3.7
Prospectus/registration statements for IPOs*	3.7		
Special events reports – e.g., 8K filings*	3.5		
Shareholder reports/proxy statements*	3.1		
Periodic supplements/fact books	3.1	3.0	
Question 7: On a scale of 1 to 5, please indicate the level of importance that each of the following company financial statements has to your financial analysis.	N = 849		
Cash flow statement	4.7	4.6	4.4
Income statement	4.7	4.5	4.6
Balance sheet	4.6	4.6	4.4
Notes to the financial statements	4.4	4.5	
Management discussion and analysis	4.1	4.1	4.3
Statement of shareholders' equity	3.5	3.2	3.7

(Results shown are the mean rating and exclude “no opinion.”)

Question 8 asked respondents about specific data attributes and their importance to the valuation process. The items queried represent many of the relevant factors to conducting a successful fundamental analysis of a company. The results showed that investors expect companies to provide reliable and consistent information in their financial reports.

⁴ Previous surveys on financial reporting were conducted under our former name of AIMR and are available on the CFA Institute website: <http://www.cfainstitute.org/centre/overview/groups/reporting/surveys.html>

Question 8: On a scale of 1 to 5, please indicate the level of importance that each of the following data attributes or characteristics⁵ has to performing your analysis and evaluation of a company's financial condition and performance?

- **Data Reliability:** The data and its label are representative of the required financial reporting standards and definitions. (4.7 out of 5)
- **Data Consistency:** The data is presented in a similar way and/or format over time (4.5 out of 5)
- **Data Timeliness:** The data is easily accessible from the source document upon its release. (4.4 out of 5)
- **Data Granularity:** The data is disaggregated to show detailed information about the quantity and nature of reported financial statement items – assets, liabilities, revenues, and expenses. (4.3 out of 5)
- **Data Comparability:** The data is standardized by the nature of the transaction and/or business activity. (4.3 out of 5)

These questions had a direct impact on our discussion of the first principle, requiring the taxonomy to follow current financial reporting standards. The goal of any securities regulator's XBRL program should be to ensure that it follows financial reporting requirements and improves investors' access to companies' financial reports. The backbone of the program is the core taxonomy of tags. Having the basis for the taxonomy grounded in the regulatory and accounting standards provides a threshold for the development of the base tags. However, financial and valuation models often require additional information about the companies' operations in order to project future cash flows.

To derive longer-term benefits from XBRL, we believe the taxonomy development must be an ongoing process, incorporating items outside the basic requirements as currently required under GAAP, as well as new financial reporting requirements that may be developed under GAAP. As financial data tagging moves to other company reports and provides the level of granularity investors seek, we foresee the development of taxonomies that also provide operational detail and other important company information. The taxonomy could further evolve to incorporate dividend, capital raising, and other disclosures. Our goal is to have all discrete items included in all company-released sources to be assigned an XBRL tag.

Our second principle, which deals with maintaining comparability by minimizing the extensibility aspects of XBRL, was directly influenced by the results of question 12 of our

⁵ Data attributes listed were defined specifically to address characteristics relating to XBRL tagged data, e.g., the relationship between the reported amount and the assigned XBRL tag; the detail level for which reported amounts should be tagged; and defined structure or taxonomy of XBRL tags.

survey. Of 237 respondents to Question 12, 91 percent⁶ indicated a preference for companies to have no or limited ability to extend the taxonomy.

As analysts we understand the value of company-specific tags for management's use in trying to convey messages to investors. In fact, a company's unique message is often an essential factor in an investor's investment decisions. However, with more than 10,000 tags already established, we believe most companies should find the flexibility and tags they need to convey their message within the existing taxonomy. The overuse of extensibility, or company-specific tags, will severely diminish the usefulness and comparability of financial reports. We do recognize that in rare instances, there may be a need for a unique, customized extension. To account for those rare cases, our principles recommend that regulators adhere to limiting certain levels of the taxonomy so they cannot be extended, thereby ensuring a minimum level of comparability. For example, we would expect that any extensions relate to the appropriate non-extensible parts of the taxonomy (e.g., the extension can be rolled up to appropriate higher levels, such as a liability rolling into current liabilities if it is expected to come due within one year). The practices and rules of the PG provide many positive examples as to how companies can adjust the UGT to tell their story, while continuing to use the tags provided. We suggest that as the use of XBRL progresses, XBRL US and the SEC monitor companies' extension practices to determine if their rules need further refinement.

With our third principle, we recommend that regulators move to mandate the use of XBRL for all required filings. Our main objective is for the SEC to advance its efforts past just the financial statements of the 10Q/K filings, and to develop a plan for a single XBRL-related filing. Moving in this direction clears the path toward addressing issues of assurance and rendering of the XBRL instance document.

When the SEC moves to a single XBRL-based 10Q/K filing, investors will use it for the basis in making investment decisions. Question 14 asked respondents to indicate the level of assurance necessary for the XBRL filings. Eighty percent of the 238 respondents expressed the need for assurance to come from an independent organization, with 50 percent indicating the desire for XBRL tagging to be integrated into the annual audit of the financial statements.

Question 14: What level of assurance is necessary to ensure that the proper XBRL tags are assigned to the reported amounts in accordance with GAAP defined tags? (For example – A company has tagged the cash amount reported on the balance sheet with the XBRL defined tag for “cash – balance sheet.”)

- 50% selected—**Integrated audit and/or review by an independent auditor/reviewer** as to the appropriateness of XBRL tagging of reported amounts; this assurance would be included in the overall audit and/or review of company's financial reports and disclosures filed with regulatory bodies, e.g., stock exchanges or securities regulators

⁶ The 91% was broken down as 66% for limiting the ability to add extensions and 25% selecting no ability to customize. The remaining 9% indicated companies should have total freedom to extend the taxonomy. Full details are available on pages 30-32 of the XBRL Survey Report: http://www.cfainstitute.org/centre/topics/reporting/pdf/xbml_survey_report.pdf

Re: Public Review of US GAAP Taxonomy and Preparers Guide
6 April 2008
Page 6

- 19% selected—**Separate audit or review by the independent auditor** as to the appropriateness of the XBRL tagging of reported amounts; similar assurance given to the information provided currently in regulatory reports without XBRL tags, e.g., annual information is audited and interim/quarterly information is reviewed
- 17% selected—**Certification by the company's managers** as to the appropriateness of the XBRL tagging of reported amounts; no audit and/or review by an independent party
- 11% selected—**Separate non-audit or review by an independent reviewer** as to the appropriateness of the XBRL tagging of the reported amounts
- 3% selected—**No certification** by the company's managers *or* no independent audit/review is necessary

The current practice of filing both HTML and XBRL versions of financial statements has created uncertainty about the assurance process for XBRL filings. Our principle addresses the need for the SEC and other regulators to require the same level of assurance for the XBRL-based filing as for the current filing. The full definition and application of this process can be vetted during the initial phases of transition as larger companies move toward the single filing format. We believe that as long as the filing of financial statements remains a two step process with separate filing of the HTML and XBRL documents (and possibly with a time lapse between those filings), the usefulness of XBRL data will be limited by its lack of immediacy. In addition, we are concerned that a two step filing procedure may impose unnecessary burdens on filers, thus imposing another barrier to acceptance of XBRL filing.

The SEC is well on its way to meeting our fourth principle of making information easily available to all investors. The implementation of EDGAR in the 1990s greatly improved equality of access to financial information for all investors. XBRL will modernize delivery even further. However, we caution the SEC not to move into the analytical arena as they offer different levels of viewers and reviewers of the XBRL filings. If there were performance and valuation ratios included in such applications, companies might modify their reporting to meet such ratios, perhaps believing them to be SEC defined and vetted ratios. Potential misunderstandings between the SEC, filing companies, and investors should be minimized if the only analytical calculations shown are defined explicitly in the accounting literature.

Our final principle reinforces the notion that all XBRL frameworks will constantly evolve. Clearly, technology is always advancing; indeed, the SEC recognized this with the planned improvements in the EDGAR system. Accounting and regulatory standards are also constantly evolving, as evidenced in the issuance of SFAS Nos. 160 and 161 during the public review period.⁷ Both statements will require modifications to the base taxonomy. The maintenance plan being developed by the SEC and XBRL US should include processes for scheduled and unscheduled changes to ensure the XBRL filings continue to meet the comparability and consistency of financial statements needed by investors.

⁷ SFAS No. 160 *Noncontrolling Interest in Consolidated Financial Statements* was issued in December 2007. SFAS No. 161 *Disclosures about Derivative Instruments and Hedging Activities* was issued in March 2008.

Comments on the Preparers Guide

The PG has progressed quite well from the early draft provided during the stakeholders' review period in November 2007. The separation of the "Rule" and the "Rule of Thumb" statements provides some clarification of what is expected of the companies reporting with XBRL from suggested practices. While this change and the ranking by impact on usefulness of extensions highlight the progress made, we continue to be concerned with a few parts of the guide. We encourage XBRL US to consider our concerns while finalizing the PG.

Our primary concern is that the overall basis of the guide is from the perspective that XBRL is only used after the current period's financial statements are completed. We understand this is the method used under the SEC voluntary filing program, but, as noted above, we do not believe that this is the appropriate method for using XBRL in the long-term. A two-stage reporting system reduces the benefits preparers could achieve as the information is not integrated into their reporting system. We recommend that the PG include some language in the introduction that notes the guide is based on current practice and future updates will be provided as the process of using XBRL tags changes.

On pages 24 and 88, the PG states a Rule that companies should only tag the information included in their completed financial statements. As discussed, these Rules are focused on today's process only, without consideration for alternative paths for XBRL tagging. We recommend that the PG Rule only apply to minimum requirements of the SEC. A Rule of Thumb could be added that encourages companies to provide XBRL tagged information beyond the minimum requirements in order to improve the clarity and usability of the report, or to provide all components of defined calculations. The PG should not create limitations as to the level of information companies could choose to provide to investors.

On page 41 the PG contains a Rule of Thumb to use the UGT whenever possible. We recommend upgrading this item to a Rule. If companies do not believe they have to use the UGT to tag their financial information, they may create unnecessary company-specific tags. Our principles highlight the need to limit company-specific tags to maintain the comparability provided within the structured XBRL framework. Section 6 on creating extensions ranks extensions on their potential impact to the usefulness of the standardized XBRL tagged information. This ranking and other discussions throughout the PG appear to stress the need to use the taxonomy whenever possible; converting the initial statement to a Rule further reinforces the concept.

In discussing different types of extensions, the PG has different recommendations on whether companies need to provide definitions for company-specific additions. We would prefer that definitions be a requirement with all such additions. This allows the investor to properly understand the need and intention of the company-specific tag. Without a definition, investors have to infer the meaning of a tag solely from the label provided.

Section 7 on instance documents describes the filings as a collection of financial facts. This description seems to limit the intention of using XBRL in the 10Q/K filings. As the SEC moves

Re: Public Review of US GAAP Taxonomy and Preparers Guide
6 April 2008
Page 8

forward in mandating that companies file using XBRL, the instance document needs to include all the sections of the current filings. With the various discussions on the use of text block tags, XBRL US may want to consider expanding its classification of the instance document to include company, operating, and financial facts.

Comments on Current Taxonomy

The work completed on the UGT to expand the available tags to include information in the disclosure notes and for commonly reported items will benefit investors once adopted. The disclosure notes are especially important to analysts as this represents an area of information that is currently difficult and time consuming to collect. Through the adoption of the UGT in the voluntary program and required through a mandate, we believe the company filings will reinforce the benefits it provides over the original base taxonomy.

We did, however, find a few problem situations during our review. Someone unfamiliar with the UGT may have trouble navigating to or finding their desired tag. The presentation by financial statement and disclosure note is clear enough, but the number of clicks it takes to reach the actual tags is overwhelming. In looking for the tag “Operating Income(Loss),” the user must open 10 different parent links. While each of the abstracts that are opened may offer some value in creating an instance document, an analyst looking to create a model needs a more streamlined path to the tags. We recommend addressing this concern as a short-term objective, and encourage XBRL US to design an appropriate and streamlined method. Hopefully, in conjunction with the software companies, navigation of the taxonomy can be significantly improved.

In attempting to find “Operating Income(Loss)” directly, we used the search function. The results returned 10,017 documents for the term “Operating Income” when searched from the Real Estate taxonomy. Needless to say, this was not helpful. Fortunately, using the standard Google search qualifier of including the combined terms in quotes, the results narrowed to 80 documents, still a significant number of documents. It appears these results combine all the different taxonomy entry points, as tags labeled “Operating Profit” and “Operating Income Loss” each appears five times. Additional work appears necessary to truly make the search feature function as a user might expect.

We also recommend that XBRL US consider merging the Banking and Savings Institutions and Broker Dealer taxonomies. Our review noted no major structural differences between the taxonomies so they could share a standard presentation linkbase. While there are some elements specific to each list, we believe they could be successfully combined. We encourage this move as many companies operate in both of these industries and a single taxonomy would allow for greater comparability between them. This also brings the taxonomy more in line with the International Financial Reporting Standards (IFRS), as IFRS combines these industries together in their requirements.

An area of significant importance for analysts is the industry specific earning alternatives. A search of the Real Estate taxonomy did not produce any matches for the field “Funds from Operations” or “FFO.” While this field is not defined in authoritative accounting literature, it

Re: Public Review of US GAAP Taxonomy and Preparers Guide
6 April 2008
Page 9

represents the primary earnings metric for the REIT industry. Under Regulation G, the SEC allows companies to include these calculations in their filings with the appropriate reconciliation back to a GAAP measure. We could not tell if the tag was created or if it was missed by the search. Either way, analysts will need XBRL tags for this and similar earning alternatives for other industries to successfully populate their financial and valuation models.

We understand the reasons behind building the taxonomy based on the disclosure practices of numerous companies. The result has been the creation of tags for items directly required in the accounting literature that also fit companies' actual implementation of other accounting concepts. We note the method also fits the XBRL usage model of applying the tags after the creation of the financial statements. However, we believe the ability to view the tags in a topical format potentially assists with integrating the tags earlier into the reporting process. As new tags become necessary, the preparers search for the concept of the item and not where it may appear in someone else's report.

While this view may not benefit investors without a detailed understanding of the accounting standards, it provides flexibility for many others. Those analysts with the required knowledge can search for the specific field and its related disclosures. Regulators also can use this format to test companies' adherence to the requirements. While this change is not necessary to advance the XBRL program, we recommend its development as a short-term goal for XBRL US.

Conclusion

While we still have questions on the practical application of the PG and UGT in future reports, we believe both offer improvements over the structure of the voluntary program. With more than 10,000 tags, the UGT should meet the information needs of investors with sufficient information tagging by companies. The PG provides a sound basis for companies to begin incorporating XBRL tagging into their financial reporting process.

We appreciate the opportunity to provide comments to the XBRL US regarding their work on the SEC Interactive Data project. If any party should have questions or seek further elaboration of our views, please contact Glenn Doggett, CFA, by phone at 434.951.5278 or by e-mail at glenn.doggett@cfainstitute.org.

Sincerely,

/s/Kurt N. Schacht

Kurt N. Schacht, CFA
Managing Director

/s/ Thomas H. Larsen

Thomas H. Larsen III, CFA
Chair, CFA Institute XBRL Working Group

cc: Campbell Pryde, VP, Domain and Chief Standards Officer, XBRL US, Inc
David Blaszkowsky, Director of Interactive Disclosures, US SEC
Jeffrey D. Diermeier, CFA, President and CEO, CFA Institute
Ray DeAngelo, Managing Director, Member and Society Division, CFA Institute
CFA Institute XBRL Working Group

Appendix I

Key Principles of an XBRL Framework

The CFA Institute Centre for Financial Market Integrity established the XBRL Working Group of CFA Institute members in early 2007. XBRL (eXtensible Business Reporting Language) represents a new technology for delivering computer readable financial information⁸. The objectives of the group included conducting a survey on XBRL and incorporating the survey results into a position paper on the topic. Through their research, discussions, and analysis of the survey results⁹, the Working Group developed the following key principles to outline those XBRL framework attributes they believe are necessary to maximize the benefits for investors.

1. Core taxonomy (or structure of tagging elements) should be predefined by current financial reporting standards, including generally accepted accounting principles and other regulatory disclosure and reporting requirements.
2. Taxonomy extensibility should maintain the level of data comparability as defined by GAAP and other regulatory requirements.
3. Ultimately, companies should deliver required financial reports to regulators using the established XBRL framework.
4. The general public should have equal access to the XBRL-tagged information.
5. Regulators should develop the necessary infrastructure and protocol to ensure the timely updating of the established XBRL framework as outlined in the preceding four key principles.

These principles are intended to guide global regulators in the implementation of XBRL as their required reporting standard. As such, our use of the term “GAAP” applies to the broad application of generally accepted accounting principles and not to any specific national or international accounting standards. (The CFA Institute Centre does also hold a longer term goal of seeing the adoption of a single global accounting standard, which would include a unified XBRL taxonomy for the standard.)

⁸ Additional details about “What is XBRL?” are available on the CFA Institute website:

<http://www.cfainstitute.org/centre/topics/reporting/xbrl/index.html>

⁹ The full survey results are available on the CFA Institute website:

<http://www.cfainstitute.org/centre/topics/reporting/xbrl/topline.html>

Appendix I, continued

The XBRL Working Group, while developing the key principles, outlined several sub-topics further clarifying the intention of each principle. The CFA Institute Centre staff and XBRL Working Group members remain open to further discussion on the developed principles so that we maintain a reasonable balance between promoting XBRL's benefits and minimizing the burden that implementation of XBRL places on the companies preparing financial reports.

1. Core taxonomy (or structure of tagging elements) should be predefined by current financial reporting standards, including generally accepted accounting principles and other regulatory disclosure and reporting requirements

- The elements in the core published taxonomy should follow the current approved accounting and/or regulatory requirements.
- Discrete elements for the note disclosures should provide, at a minimum, the same discrete, specified information required in the GAAP literature (e.g., individual values and specific disclosures in notes should be individually tagged in addition to the entire narrative or note disclosure as it appears in the original filing).
- The taxonomy design should allow for the grouping of related topical fields regardless of whether the elements appear on the primary financial statements or in disclosure notes (e.g., all elements related to pension information should be linked and accessible by topical grouping), thus allowing the presentation of elements from the disclosure notes and financial statements under a single topical heading.
- The elements in non-GAAP taxonomies should address the disclosure requirements of the capital market regulator (e.g., management discussion and analysis, other sections of the annual financial reports).
- The disclosure requirements of commonly reported corporate action events of capital market or other regulators (e.g., dividend announcements, stock splits, corporate restructuring, voting results) should be addressed in additional non-GAAP taxonomies.

2. Taxonomy extensibility should maintain the level of data comparability as defined by GAAP and other regulatory requirements

- The taxonomy should allow companies to report their operational performance and financial conditions. A robustly defined taxonomy should limit the need for custom extensions or company-specific tags for unique items not covered in the core taxonomy.
- When custom extensions are necessary, preparing companies should be given a specified protocol as defined by regulations or accounting literature on how to link the company-specific element(s) to the core GAAP taxonomy.

Appendix I, continued

- Custom extensions should not alter the primary element definitions and calculation relationships within the published taxonomy.
- When adding a custom extension, companies should include sufficient detail in the definition and regulatory reference sections of the new element so users can understand the difference from the core taxonomy field.
- New technological features should either reduce or have a neutral impact on the need for company-specific taxonomies in order to maintain a minimum level of comparability as defined by regulations and GAAP.

3. Ultimately, companies should deliver required financial reports to regulators using the established XBRL framework

- Regulators should mandate all reports required by GAAP and other regulations be delivered exclusively through an XBRL framework.
- Reports filed should include a table of contents that identifies each section of the filing (e.g., primary financial statement, disclosure notes, MD&A) and allows for easy navigation between the various sections.
- To provide the same level of assurance currently given to filed reports, the independent review of XBRL filed reports should be part of the regular audit process. The development of a transition process will minimize duplicative efforts and costs during the implementation of the XBRL framework.
- The body of the filed report should include basic information about the reporting entity, such as legal name, industry classification, primary security ticker, report date, form type, etc.
- The XBRL framework should delineate the relationships between the values associated with the XBRL tagged values and the contextual attributes of the information (e.g., audited, restated, time period reference). Contextual information types for segment (e.g., consolidated, segmented, geographical) and scenario information (e.g., audited, restated) should be developed to assist in automated analysis.
- When developing or modifying the taxonomy, an independent, electronically-accessible review should be performed to account for the end user/investor perspective of the technical implementation and the elements (high-level categories and structure) approved.

Appendix I, continued

4. The general public should have equal access to the XBRL tagged information

- Regulators that establish an XBRL reporting framework need to provide, at a minimum, a base-level application, that transforms the XBRL tagged report from a computer-readable format to a human readable/useable format. Such application should include a user-friendly interface to allow online viewing and download capability of XBRL-sourced information.
- The technology regulators use in their XBRL reporting frameworks should remain “open source”¹⁰ to promote development of and competition between third-party software providers.
- Regulators that adopt an XBRL framework should encourage the electronic redistribution of filed information—including the values and the tag—in various formats (e.g., spreadsheet, database readable, other applicable software).
- Information should be structured so that users may sort and view data either by individual elements (e.g., net income or dividends paid), by topical grouping of elements (e.g., plant, property and equipment, pension disclosures), or as a complete download of all elements (e.g., complete financial filing or a single primary statement). Also, such information should be downloadable either for individual or multiple companies.
- Regulators that adopt an XBRL framework should only define or provide analytical calculations as defined in the accounting literature. Likewise, they should only provide software that facilitates the investor’s ability to make this type of calculation and analysis.

5. Regulators should develop the necessary infrastructure and protocol to ensure the timely updating of the established XBRL framework as outlined in the preceding four key principles

- The core taxonomy should be modified as needed to keep current with any changes made to the accounting or regulatory standards.
- Regulators should make regularly scheduled reviews of the custom extensions to determine the need to add new common items to the core taxonomy.
- Regulators should promptly review for adoption any technological advances approved by XBRL International.
- Regulators should coordinate updates to regulator-approved XBRL software with changes to the taxonomy and any newly-adopted XBRL technology standards.

¹⁰ Open source generally refers to an application and its source code that is available royalty-free and allows redistribution without any restrictions. The expectation of keeping XBRL technology in this format is to promote adoption by regulators, companies, and investors worldwide. This would also encourage the development of robust processing tools both internally by companies using or producing XBRL tagged information and by external software companies.