



# ***SEC Staff Briefing on Interactive Data***

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XBRL Polska  
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## ***Disclaimer***

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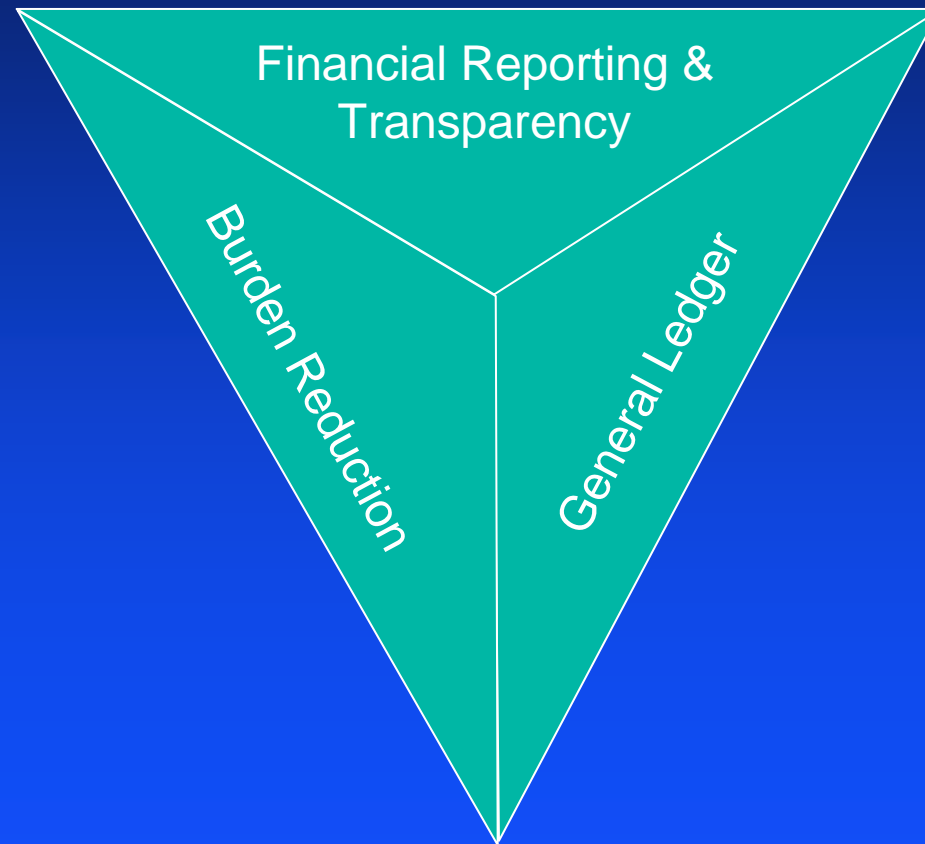
# *Today's discussion*

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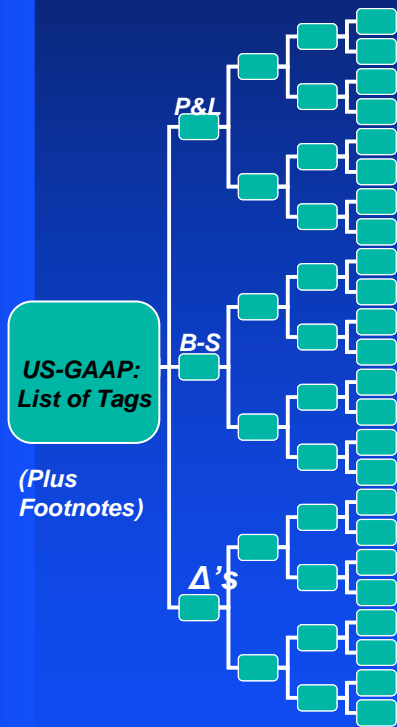
- ❖ What / Why interactive data?
- ❖ What is the SEC proposing?
- ❖ What can financial managers do?

# *Choices in Interactive Data Implementation Models*

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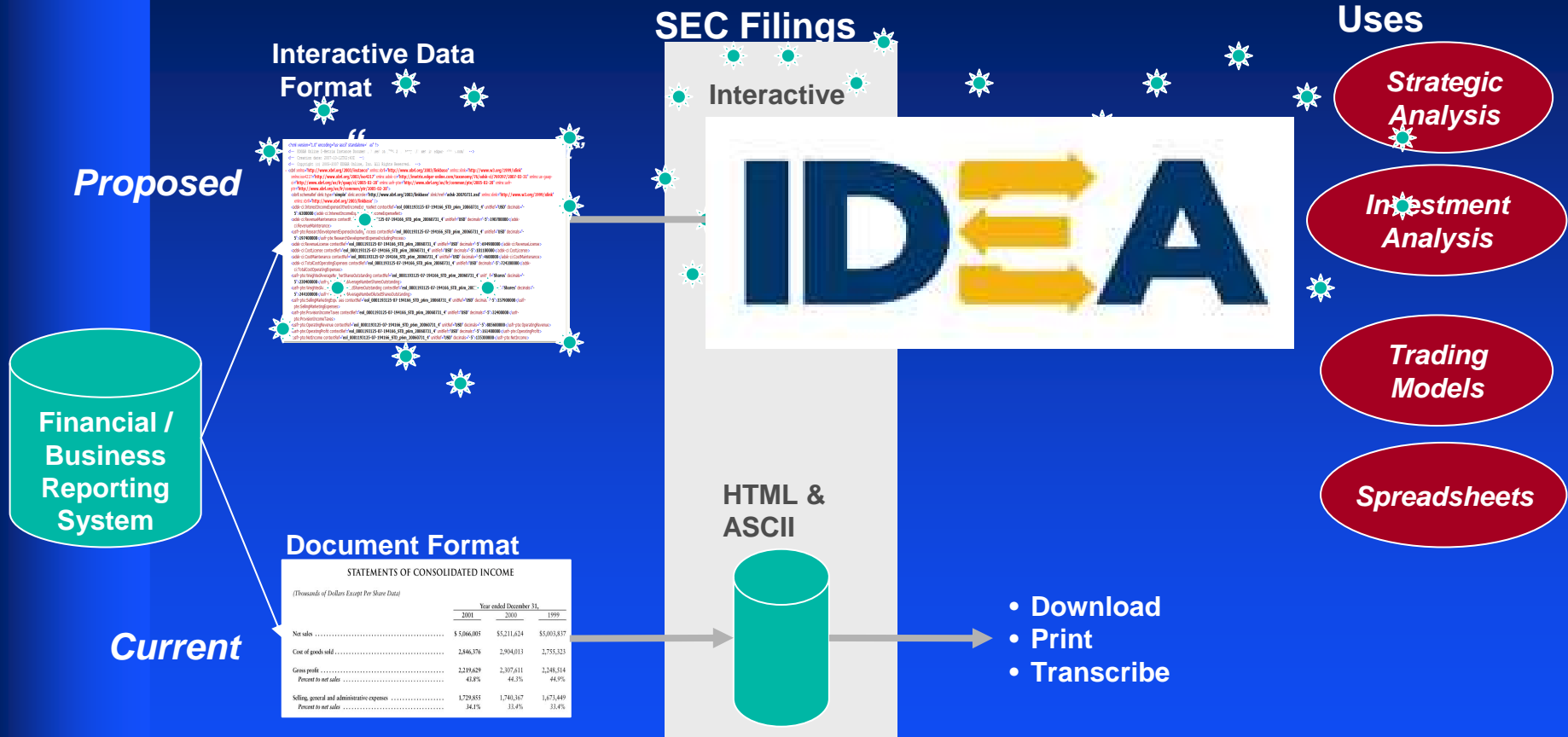


# “Interactive Data” Liberates Financial Data



STATEMENTS OF CONSOLIDATED INCOME			
<i>(Thousands of Dollars Except Per Share Data)</i>			
	Year ended December 31,		
	2001	2000	1999
Net sales .....	\$ 5,066,005	\$5,211,624	\$5,003,837
Cost of goods sold .....	2,846,376	2,904,013	2,755,323
Gross profit .....	2,219,629	2,307,611	2,248,514
<i>Percent to net sales</i> .....	43.8%	44.3%	44.9%
Selling, general and administrative expenses .....	1,729,855	1,740,367	1,673,449
<i>Percent to net sales</i> .....	34.1%	33.4%	33.4%

# Rethinking SEC Filing: From EDGAR to IDEA



## Document Format

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# *Why is Interactive Data Important for Company Information?*

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## *Filers/Corporations*

- ❖ Operational Benefits
  - ◆ Process improvements
  - ◆ Easier/Faster compliance
  - ◆ Better business analysis
- ❖ Better communication, visibility to investors
  - ◆ *Especially* for mid/small-caps, non-US firms

## *Buy-side*

- ❖ “Faster, cheaper, better”
- ❖ As-reported, and complete
- ❖ No introduced errors
- ❖ More useful: Easier to ID, import, transform, analyze, apply “hi-tech” functionality
- ❖ Higher analysis productivity
- ❖ Improved comparability, especially globally



***Improved Market Efficiency***

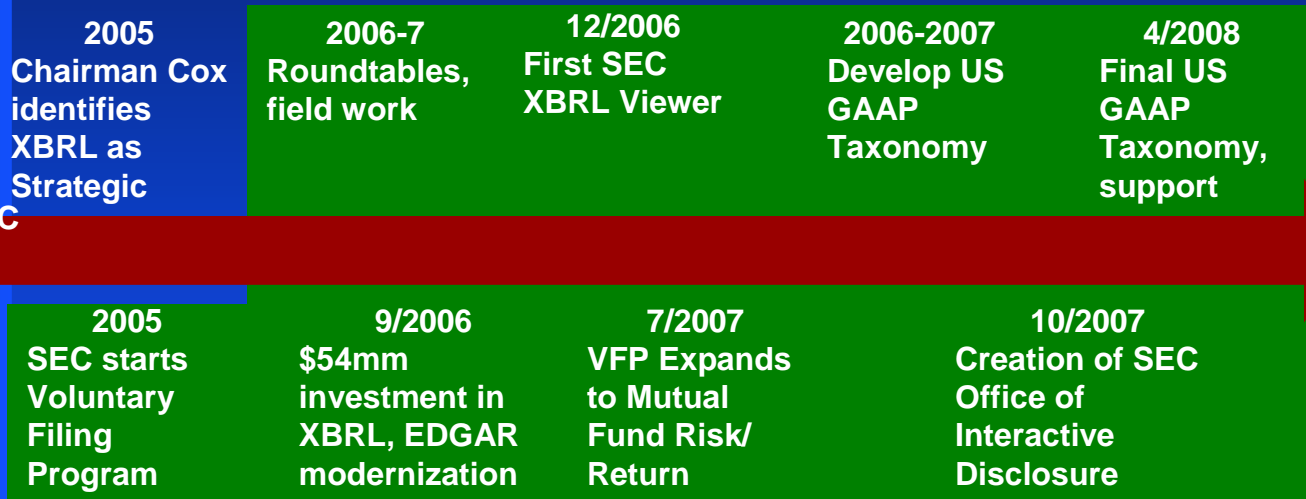
# *From XBRL to “Interactive Disclosure”*

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- ❖ Keeping it all in context..
  - ◆ XBRL is just a technology...
  - ◆ “Interactive Data” is a concept...
  - ◆ ...”Interactive Disclosure” is about how to make what is disclosed easier to disclose, and easier/cheaper for investors to use

# Progression of Interactive Data in the US

2002  
Early SEC  
Analysis  
of XBRL



**2008**

**Proposed Rules**

- Companies
- Mutual Funds
- Ratings

# *Proposed Rule to Require Companies to Report Using Interactive Data*

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- ❖ What will be required
- ❖ Who and when
- ❖ Important additional features

# *What would be required*

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## ❖ Content:

- ◆ Primary financial statements
- ◆ Notes
- ◆ Financial statement schedules.
- ◆ Certain company identifier information

## ❖ Forms

- ◆ Periodic Reports
- ◆ Transition Reports
- ◆ Registrations
- ❖ Interactive data requirements would supplement, not replace, disclosures using HTML or ASCII
- ❖ “Disclosure Neutrality”

# Proposed Phase-in Schedule

## What?

## Who?

Filer Group	• “Face Financial Statements”	“Detail Tagged”
	• “Block Tagged” Footnotes & Schedules:	Footnotes & Schedules:
	<i>Starting Fiscal Periods Ending:</i>	
<i>Domestic/Foreign Large Accelerated Filers Using US GAAP</i>		
• <i>Public Float &gt;\$5 billion</i>		
• <i>All other Large/Accelerated Filers</i>		
<i>All other Filers in US GAAP (including smaller reporting companies)</i>		
<i>All Issuers using IFRS as published by the IASB</i>		

**30 day grace period, from the filing date of the related report, for the initial submission of interactive data exhibit**

# *Important Provisions*

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- ❖ Interactive Data will be provided in the form of a new exhibit
- ❖ Companies can choose to begin to provide interactive data exhibits before they are required
- ❖ Must be posted to the Filer's website, if it has one, at the same time it is provided to the SEC
- ❖ Filers who do not provide interactive data exhibits on the date required would be deemed "not current" with Exchange Act reporting
  - ◆ Short-form Registration
  - ◆ Rule 144
- ❖ Data in the interactive data file would be subject to liability similar to that of the voluntary program
- ❖ Higher liability for Viewer content

# *Next Steps for Interactive Data*

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- ❖ **Opportunity for US-listed Polish companies**
- ❖ **Broad-based adoption of XBRL by national markets for public reporting**
  - ◆ **Regulator and Exchange collaboration**
  - ◆ **IFRS and XBRL**
- ❖ **Emerging market for analytic and management tools**
- ❖ **Additional applications of XBRL**
  - ◆ **Other portions of required corporate and fund filings**
  - ◆ **Derivative and other non-transparent securities**
  - ◆ **Optional disclosures**
  - ◆ **Standardized data for complicated securities processes**

# *Thank You*

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## *Contact Information for Questions*

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