



THE CHAIR

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

August 19, 2015

The Honorable Mark R. Warner  
United States Senate  
475 Russell Senate Office Building  
Washington, DC 20510

Dear Senator Warner:

Thank you for your July 21, 2015 letter regarding the use of eXtensible Business Reporting Language (XBRL) in disclosure requirements for public companies. You have asked for an update about a possible change to the Commission's rules to allow for "inline" XBRL.

As you noted, in the Strategic Plan for Fiscal Years 2014-2018, the Commission highlighted plans to improve the quality and usefulness of disclosure using machine-readable, structured data as one of its many priorities during this period. Structuring data, including in XBRL, allows investors and Commission staff to systematically and efficiently analyze and draw conclusions from large quantities of information.

SEC staff currently is developing recommendations for the Commission's consideration to allow filers to submit XBRL data inline as part of their core filings, rather than filing XBRL data in an exhibit. That data would then be available in the financial statement presentation in the filing displayed on the SEC website. Use of an inline format may help to improve the quality of structured disclosures, ease filer burden, and facilitate additional staff review. Any rule changes undertaken by the Commission as a result of the staff's recommendations would be subject to the notice and comment rulemaking process under the Administrative Procedures Act.

In addition, as you may know, the Commission's EDGAR system is not currently capable of accepting filings with inline XBRL. Staff in the Commission's Division of Economic and Risk Analysis currently is working to enable the successful implementation of inline XBRL capabilities within EDGAR to accept inline filings under either a voluntary or mandatory program.

Thank you again for your letter. Please do not hesitate to contact me at (202) 551-2100, or have a member of your staff contact Tim Henseler, Director of the Office of Legislative and Intergovernmental Affairs, at (202) 551-2010, if you have any questions or comments.

Sincerely,

Mary Jo White  
Chair