

July 31, 2008

Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

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

We appreciate the opportunity to comment on the Securities and Exchange Commission's proposed rule, Interactive Data to Improve Financial Reporting, and commend the Commission's efforts to continually improve financial reporting.

Since the EDGAR system was launched, we have focused our core business around making the EDGAR filing process quick, easy, accurate and cost effective for thousands of financial, legal and corporate clients. With this focus, our EDGARizer® software has become the most widely used application to convert and file documents with the EDGAR system. In addition, we are one of the largest filing agents supporting the industry.

For the last 5 years, we have been participating in the eXtensible Business Reporting Language (XBRL) consortium and actively developing technology and services that assist our clients in creating and filing XBRL documents hand-in-hand with EDGAR HTML documents. We have trained over a thousand clients on XBRL and assisted many others integrate XBRL into their financial reporting process. We are unique in the ability to allow clients to bring the entire process in-house, outsource it to our service or any combination above.

Through this experience, we have found that companies are able to easily grasp the concepts of XBRL. With the appropriate structure and tools, they are able to implement systems to address it with limited effort. We have therefore focused our comments on more technical aspects of the rules package. We believe that the SEC should create the framework and allow the private sector to provide filers with efficient and cost effective solutions for creating, filing and analyzing their documents and the incorporated information.

One primary issue that needs to be addressed is the format(s) in which documents will be filed. Currently, we work with companies to file their documents in the HTML or ASCII format. The format is stable and provides an excellent human readable format that companies can easily manipulate to have their company's look and feel. Unlike HTML, XBRL was created not with a focus on a human readable format, but as a computer readable language to allow computers to gather and manipulate data. While guidance is being developed for rendering XBRL in a more consistent and human friendly manner, it is not sufficiently developed, nor is it clear it will be able to replace HTML. As a result,

