



April 19, 2017

Via Electronic Submission to: rule-comments@sec.gov

Mr. Brent J. Fields
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Re: Comments on Inline XBRL Filing of Tagged Data

Dear Mr. Fields:

At TagniFi we're proud to be an early adopter of the Inline XBRL financial disclosures that have been allowed by the Commission on a voluntary basis since June 2016. We're excited about the possibilities that Inline XBRL presents. For example, the technology will allow us to improve the transparency of our standardized data by sending our clients to the specific location in a filing where a tagged value was presented.

Our experience with using XBRL to collect and standardize financial data is extensive. To date, we've collected and standardized financial statements from XBRL for more than 6,000 companies representing over 99% of the US market capitalization. We've collected XBRL data from approximately 140,000 XBRL filings dating back to the Commission's roll-out of XBRL in 2009.

One of our key selling points at TagniFi is data quality. Many of our clients are using our standardized data to make investment decisions or to value private companies for tax purposes. They depend on the highest level of data quality. We target 99.99% data quality for our dataset.

Data quality is also something that we believe is important for XBRL to not just survive but thrive into the future. Without XBRL it would be extremely expensive for us to collect financial data from HTML therefore we need XBRL to thrive if we are going to continue growing as a company.

In the past we've documented many examples of the issues with data quality on our blog (<https://www.tagnifi.com/category/xbrl/>). Unfortunately, many of the voluntary Inline XBRL disclosures we've seen do not present an improvement in data quality over traditional XBRL filings. An example of the errors we're finding is presented in the attached Exhibit A. Each of the highlighted red boxes indicate an error in the XBRL identified during our quality assurance processes.

Errors like those highlighted in Exhibit A present challenges to end users and other data companies like ours. Each of these errors needs to be corrected which typically requires extensive time and effort by an analyst. Inline XBRL filings with errors like those in Exhibit A should be easily identified and rejected by EDGAR before they end up polluting the dataset.

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Please consider using Inline XBRL as an opportunity to implement new validation rules in the filing submission process. Without enhanced validation we don't see how Inline XBRL is going to deliver on its promise of improved data quality.

In closing, we would like to thank you and your colleagues at the Commission for your continued hard work toward ensuring that investors have access to the accurate and timely information they need to make informed investment decisions.

Sincerely,

A handwritten signature in black ink, appearing to read "Chad Sandstedt", with a long horizontal flourish extending to the right.

Chad Sandstedt, CFA

Co-founder

TagniFi, LLC

www.tagnifi.com

Exhibit A

Inline XBRL Error Example (XBRL Viewer)



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MILLER HERMAN INC (Filer) CIK: 0000066382

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10-Q	Condensed Consolidated Statements of Cash Flows (Unaudited) - USD (\$) \$ in Millions	9 Months Ended	
		Mar. 04, 2017	Feb. 27, 2016
Cover	Cash Flows from Operating Activities:		
Document and Entity Information	Net earnings	\$ 90.6	\$ 96.9
Financial Statements	Adjustments to reconcile net earnings to net cash provided by operating activities:		
Condensed Consolidated Statements of Comprehensive Income (Unaudited)	Depreciation and amortization	43.0	39.9
Condensed Consolidated Balance Sheets (Unaudited)	Stock-based compensation	9.2	9.3
Condensed Consolidated Balance Sheets (Parentheticals)	Excess tax benefits from stock-based compensation	(0.5)	(1.1)
	Pension and post-retirement expenses	0.3	1.1
	Earnings from nonconsolidated affiliates net of dividends received	(1.0)	0.3
	Deferred taxes	3.9	(2.1)
	(Gain) loss on sales of property and dealers		(0.1)
	Restructuring expenses	3.7	0.0
	Increase in current assets	(8.4)	(26.0)
	Decrease in current liabilities	(23.2)	(0.1)
	Increase in non-current liabilities	4.2	6.3
	Other, net	1.0	1.3
	Net Cash Provided by Operating Activities	122.1	125.9
	Cash Flows from Investing Activities:		
	Proceeds from sales of property	0.0	3.2
	Marketable securities purchases	1.2	7.3
	Marketable securities sales	0.8	5.7
	Acquisitions, net of cash received	0.0	(3.6)
	Equity investment in non-controlled entities	(13.3)	0.0
	Capital expenditures	(70.5)	(55.2)
	Payments of loans on cash surrender value of life insurance	(15.3)	0.0
	Net receipts from notes receivable	1.4	0.1
	Other, net	(0.9)	(0.9)
	Net Cash Used in Investing Activities	(99.0)	(58.0)
	Cash Flows from Financing Activities:		
	Dividends paid	(29.2)	(26.0)
	Proceeds from issuance of long-term debt	659.3	615.2
	Payments of long-term debt	(646.7)	(664.9)
	Payment of deferred financing costs	(1.4)	0.0
	Common stock issued	7.6	6.7
	Common stock repurchased and retired	(17.2)	(8.7)
	Excess tax benefits from stock-based compensation	0.5	1.1
	Purchase of redeemable noncontrolling interests	(1.5)	0.0
	Payment of contingent consideration	1.1	0.0
	Other, net	0.1	0.0
	Net Cash Provided by (Used in) Financing Activities	(29.6)	(76.6)
	Effect of Exchange Rate Changes on Cash and Cash Equivalents	0.0	0.3
	Net Decrease in Cash and Cash Equivalents	(6.5)	(8.4)
	Cash and Cash Equivalents, Beginning of Period	84.9	63.7
	Cash and Cash Equivalents, End of Period	\$ 78.4	\$ 55.3

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Inline XBRL Error Example (HTML View) -

		Nine Months Ended	
		March 4, 2017	February 27, 2016
Cash Flows from Operating Activities:			
Net earnings	\$	90.6	\$ 96.9
Adjustments to reconcile net earnings to net cash provided by operating activities:			
Depreciation and amortization		43.0	39.9
Stock-based compensation		9.2	9.3
Excess tax benefits from stock-based compensation		(0.5)	(1.1)
Pension and post-retirement expenses		0.3	1.1
Earnings from nonconsolidated affiliates net of dividends received		(1.0)	0.3
Deferred taxes		3.9	(2.1)
(Gain) loss on sales of property and dealers		(0.7)	0.1
Restructuring expenses		3.7	—
Increase in current assets		(8.4)	(26.0)
Decrease in current liabilities		(23.2)	(0.1)
Increase in non-current liabilities		4.2	6.3
Other, net		1.0	1.3
Net Cash Provided by Operating Activities		122.1	125.9
Cash Flows from Investing Activities:			
Proceeds from sales of property		—	3.2
Marketable securities purchases		(1.2)	(7.3)
Marketable securities sales		0.8	5.7
Acquisitions, net of cash received		—	(3.6)
Equity investment in non-controlled entities		(13.3)	—
Capital expenditures		(70.5)	(55.2)
Payments of loans on cash surrender value of life insurance		(15.3)	—
Net receipts from notes receivable		1.4	0.1
Other, net		(0.9)	(0.9)
Net Cash Used in Investing Activities		(99.0)	(58.0)
Cash Flows from Financing Activities:			
Dividends paid		(29.2)	(26.0)
Proceeds from issuance of long-term debt		659.3	615.2
Payments of long-term debt		(646.7)	(664.9)
Payment of deferred financing costs		(1.4)	—
Common stock issued		7.6	6.7
Common stock repurchased and retired		(17.2)	(8.7)
Excess tax benefits from stock-based compensation		0.5	1.1
Purchase of redeemable noncontrolling interests		(1.5)	—
Payment of contingent consideration		(1.1)	—
Other, net		0.1	—
Net Cash Provided by (Used in) Financing Activities		(29.6)	(76.6)
Effect of Exchange Rate Changes on Cash and Cash Equivalents			
		—	0.3
Net Increase in Cash and Cash Equivalents		12.1	10.3

Source: <https://www.sec.gov/Archives/edgar/data/66382/000006638217000003/0000066382-17-000003-index.htm>