

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 HMTL 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.

Letter to Mr. Brent J. Fields -April 19, 2017 Page 2 of 4

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,

Chad Sandstedt, CFA

Clerk Sens

Co-founder TagniFi, LLC

www.tagnifi.com

Exhibit A

Inline XBRL Error Example (XBRL Viewer)



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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) Equivalents 63.7 63.7 Period 63.7 63.7 Cash and Cash Equivalents, End of 8.78.4 8.55.2	Purchase of redeemable noncontrolling	(1.5)	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 8.78.4 8.55.2	Payment of contingent consideration	1.1	0.0			
Activities (29.6) (76.6)	Other, net	0.1	0.0			
Cash and Cash Equivalents 0.0 Net Decrease in Cash and Cash Equivalents (6.5) Cash and Cash Equivalents, Beginning of Period 84.9 Cash and Cash Equivalents, End of 878.4 STS 2 85.5.2		(29.6)	(76.6)			
Equivalents (0.3) Cash and Cash Equivalents, Beginning of Period 84.9 Cash and Cash Equivalents, End of 878.4 84.9 63.7 84.9 85.7 84.9 85.7	Effect of Exchange Rate Changes on Cash and Cash Equivalents	0.0	0.3			
Period 04.9 03.7 Cash and Cash Equivalents, End of 9.78.4 9.55.2	Equivalents	(6.5)	(8.4)			
	Period	84.9	63.7			
		\$ 78.4	\$ 55.3			

Inline XBRL Error Example (HTML View) -

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								Nine Mor	nths Ended	
							Mar	rch 4, 2017	Feb	ruary 27, 2016
Cash Flows from C	perating Activities:									
Net earnings							s	90.6	\$	96.9
	econcile net earnings to	net cash pr	ovided by	operating activitie	S:			_		_
	and amortization		,					43.0		39.9
Stock-based (9.2		9.3
	nefits from stock-base	d compensat	ion					(0.5)		(1.1
	post-retirement expens							0.3		1.1
	n nonconsolidated affilia		vidends re	eceived				(1.0)		0.3
Deferred taxe								3.9		(2.1
(Gain) loss or	n sales of property and	dealers						(0.7)		0.1
Restructuring								3.7		=
Increase in cu								(8.4)		(26.0
	current liabilities							(23.2)		(0.1
	on-current liabilities							4.2		6.3
Other, net	on carrent adolates							1.0		1.3
	ded by Operating Ac	ctivities						122.1	_	125.9
ash Flows from Ir	nvesting Activities:									
Proceeds from sa								=		3.2
Marketable secur								(1.2)		(7.3
Marketable secur								0.8		5.7
Acquisitions, net								=		_
	t in non-controlled enti	ties						(13.3)		<u>-</u>
Capital expenditu								(70.5)		(55.2
	ns on cash surrender v	alue of life in:	surance					(15.3)		(50.1
	notes receivable							1.4		(3.6
Other, net								(0.9)		(0.9
	in Investing Activitie	es						(99.0)		(58.0
ash Flows from F	inancing Activities:									
Dividends paid	manding Activities.							(29.2)		(26.0
	suance of long-term de	eht						659.3		615.2
Payments of long		ebt						(646.7)		(664.9
-	rred financing costs							(1.4)		(004.3
Common stock is								7.6		6.7
	epurchased and retired	4						(17.2)		(0.7
								0.5		6.7 (8.7 1.1
	fits from stock-based or							(1.5)		1.1
	eemable noncontrolling	interests								
-	ngent consideration							(<u>1.1</u>)		
Other, net	dod by /llead in Si-	anaina Acti	ultina				- <u> </u>	0.1		170.0
net Cash Provid	ded by (Used in) Fin	ancing Acti	vities					(<u>29.6</u>)		(76.6
ffect of Exchange	Rate Changes on Cas	sh and Cash	Equivalen	ts				Ξ		0.3
	ach and Cach Farring							/e E\		(0.4

 $\begin{tabular}{ll} Source: $\underline{$https://www.sec.gov/Archives/edgar/data/66382/000006638217000003/0000066382-17-000003-index.htm} \\ \end{tabular}$