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May 10, 2017

SEC Complaint Center
100 F Street NE,
Washington, D.C. 20549-0213

Comments on S7-03-17 Inline XBRL Filing of Tagged Data

Congratulations on the new inline viewer for XBRL tagged data. I believe that this viewer will not only improve the efficacy of EDGAR information, but also create an environment for solution providers to develop analytic capabilities that will benefit all the stakeholders involved with financial reporting.

In my role as a technology analyst with Gartner, Inc. (see Michael Smith at Gartner), I advise corporations on how to improve both internal and external reporting. There are two dimensions to financial reporting: **content** and **tools**. Both are necessary and neither is sufficient for 21st century financial reporting. The inline viewer is a quantum leap forward in the tools dimension, so again congratulations. The people involved in making this happen at the SEC have vision and have made a difference that will benefit many people for years to come. My remaining comments concern the content dimension of financial reporting.

I believe that the SEC is in a unique position to facilitate the development of voluntary industry standard, leading indicators of financial performance (new content). I have engaged many of the stakeholder of financial reporting on this topic for years. The stakeholders include the members of the AICPA, CFA, SASB, and others. We have developed the guiding principles together with a fair and open process for the development and evolution of such indicators (see metrics example).

This new content could be included voluntarily as part of the MD&A disclosure requirements. The new metrics, defined through a fair and open process would allow filers to be more informative and transparent about the quality and potential variability of a company's earnings and cash flow. The metrics would also allow investors to make comparisons of filers within the same industry. If the SEC were to recognize these metrics and allow the XBRL taxonomies that have been developed to be included voluntarily in MD&A disclosures and filer press releases, adoption of this new content would accelerate. This initiative is consistent with the mission of the SEC to facilitate relevancy and transparency in financial reporting.

It would be my pleasure to present to the SEC how this initiative could be accomplished. I eagerly look forward toward your response.

Sincerely yours,

Michael Smith