

Mary T. Hoeltzel
Vice President and Chief Accounting Officer



May 16, 2017

Brent J. Fields
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090
Subject: Inline XBRL Filing of Tagged Data
File No. S7-03-17

Routing TL 14A
1601 Chestnut Street
Philadelphia, PA 19192
Tel [REDACTED]
Fax [REDACTED]

Submitted via rule-comments@sec.gov

Dear Mr. Fields,

Cigna Corporation appreciates the opportunity to comment on the SEC's proposal to require the use of the Inline XBRL format for the submission of operating company financial statement information.

Cigna is one of the largest investor-owned health care and related benefits organizations in the United States, and has operations in selected international markets. Our insurance subsidiaries are major providers of medical, dental, disability, life and accident insurance and related products and services, the majority of which are offered through employers and other groups (e.g. governmental and non-governmental organizations, unions and associations) and Medicare and Medicaid products. In addition to these ongoing operations, Cigna has reinsurance, retirement and individual life and annuity businesses in run-off. Cigna also has separate account assets of over \$8 billion, nearly 15% of our total consolidated assets.

We support the SEC's efforts to improve the functionality and use of XBRL and enhance the quality of data provided to investors. We also believe that over time, the use of Inline XBRL should reduce the cost of preparing and submitting data to the Commission.

However, we do not recommend requiring Inline XBRL filings of tagged data at this time. Since 2009, when the Commission adopted rules requiring companies to submit information tagged in XBRL as an exhibit to the Official Filing submitted in the traditional HTML, we have invested significantly in implementing technological capabilities that enable us to complete XBRL data tagging using internal resources. Investing in the development of these internal capabilities has provided us with greater flexibility and control over updates to our financial statements and related disclosures during the management and Board of Director review process.

Discussions with our software partner have indicated that our existing software solution does not currently have the capability to generate Inline XBRL filings. Further, our current software partner is unable to provide a timeline during which such capabilities might be developed and available commercially. If our current software partner is unable to develop the capabilities to generate Inline XBRL data in the timeframe required to comply with the proposed new requirement, we would be forced to transition to another software provider. This assumes another software provider is able to provide a commercially viable application at an acceptable cost within the current timeline. Such a transition would be costly in a number of ways. First, the investments we've made to develop our current capabilities over the last several years would be impaired and likely have little or no value. Second, we would incur significant costs to select, develop and implement a solution with a new provider.

We purposefully elected to bring the software in-house so that we would have greater control and flexibility over XBRL tagging in our financial statements. The loss of this flexibility could give way to long queues with external providers and elongate our filing process. As a result, we prefer to continue with our existing solution and therefore, if proposed requirements are enacted with these stated effective dates, we are concerned about system readiness.

Therefore, we recommend the SEC continue the voluntary program to gain insight into issues and benefits of a required transition to Inline XBRL. Moreover, before moving forward, we recommend the SEC determine how much additional time is needed by software providers to ready their systems for this mandatory change in reporting and adjust the implementation dates accordingly.

Should you have any questions, we welcome the opportunity to discuss our comments further.

Sincerely,

A handwritten signature in blue ink that reads "Mary T. Huelzel". The signature is written in a cursive style with a large, prominent "M" and "H".