

Raymond Gillis  
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July 7, 2026

Secretary  
U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

**Re: Petition for Rulemaking Pursuant to SEC Rule 192 — AI Compute Asset Aging and Economic Yield Disclosure**

Dear Secretary:

Enclosed is my Petition for Rulemaking pursuant to SEC Rule 192, 17 C.F.R. § 201.192. I respectfully request that the Commission consider standardized supplemental disclosure for registrants making material investments in artificial intelligence compute infrastructure.

The petition focuses on AI compute asset aging by vintage, depreciation and useful-life sensitivity, utilization, asset retirements and impairments, and, where reasonably measurable, economic yield and AI compute operating contribution reconciled to existing GAAP segment information.

The proposal does not ask the Commission to designate artificial intelligence automatically as a separate GAAP reportable segment. Its purpose is to improve investor visibility into the carrying value, technological obsolescence risk, depreciation assumptions, and economic productivity of increasingly material AI compute assets.

I respectfully request that this submission be considered as a petition for rulemaking and handled in accordance with the Commission's applicable procedures.

Thank you for your consideration.

Respectfully submitted,

**Raymond Gillis**  
27 Wentworth Road  
Melrose, MA 02176

Enclosure: Petition for Rulemaking Pursuant to SEC Rule 192

**BEFORE THE  
U.S. SECURITIES AND EXCHANGE COMMISSION**

**PETITION FOR RULEMAKING PURSUANT TO SEC RULE 192**

**17 C.F.R. § 201.192**

**Petitioner:**

Raymond Gillis  
27 Wentworth Road  
Melrose, MA 02176

**Subject:** Proposed AI Compute Asset Aging, Depreciation Sensitivity, Utilization, and Economic Yield Disclosure

**I. Petition and Requested Commission Action**

Pursuant to Rule 192 of the Commission's Rules of Practice, 17 C.F.R. § 201.192, I respectfully petition the U.S. Securities and Exchange Commission to consider rulemaking, or other appropriate standardized disclosure action within the Commission's authority, addressing material artificial intelligence compute infrastructure.

Specifically, I request that the Commission consider requiring registrants for which AI compute infrastructure is material to provide standardized supplemental disclosure concerning: asset aging by in-service vintage; material accelerator or server classes stated at a non-proprietary level; gross and net carrying amounts; estimated and remaining useful lives; depreciation sensitivity; utilization; retirements, accelerated depreciation and impairments; and, where reasonably measurable, AI compute operating contribution and economic yield reconciled to reported GAAP segment information.

For purposes of any contemplated disclosure framework, materiality should be evaluated under existing securities-law principles and should consider both quantitative factors, including the significance of AI compute investment relative to total capital expenditures or property, plant and equipment, and qualitative factors, including whether AI infrastructure is central to the registrant's growth strategy, competitive positioning, or investor narrative. I do not propose a fixed percentage threshold.

**II. Investor Protection and Decision-Usefulness**

The scale and pace of investment in AI servers, accelerators, data centers, and related infrastructure create a financial reporting issue for investors. Existing financial statements recognize property and equipment, capital expenditures, depreciation expense, and segment results. Yet investors generally cannot determine the age, technological composition, remaining carrying value, utilization, or economic productivity of material AI compute assets.

This creates a profound information asymmetry regarding the risk of rapid technological obsolescence and the relationship between the economic consumption of AI compute assets and the accounting useful lives assigned to those assets. Management possesses detailed asset, workload, utilization, and deployment information that public investors generally cannot reconstruct from existing financial statements.

This disclosure gap limits an investor's ability to evaluate whether estimated useful lives reasonably reflect economic consumption and technological obsolescence, and to assess how useful-life assumptions affect

depreciation expense, operating income, and comparability among registrants.

### **III. Proposed AI Compute Fixed-Asset Aging Disclosure**

A registrant with material AI compute infrastructure should disclose AI compute assets by acquisition or in-service vintage. The schedule should include year placed in service; major accelerator or server class stated at a non-proprietary level (e.g., categorizing by broad performance tier or architectural generation rather than specific chip model numbers or proprietary cluster topologies); gross carrying amount; accumulated depreciation; net carrying amount; original estimated useful life; weighted average remaining useful life; material revisions to useful-life estimates; retirements; accelerated depreciation; and impairment charges.

The disclosure should be designed to avoid requiring proprietary server architecture or commercially sensitive configurations. Its purpose is to permit investors to assess the aging and carrying value of material classes of AI compute infrastructure and to evaluate changes in the economic productivity of successive in-service vintages.

### **IV. Depreciation Sensitivity and Early-Warning Value**

A registrant should disclose the estimated effect of a reasonable reduction in the useful life of material AI compute assets. For example: “A one-year reduction in the weighted average remaining useful life of the Company's AI compute equipment would have increased annual depreciation expense by approximately \$X billion and reduced pre-tax income by approximately \$X billion.”

The rapid improvement of processors, accelerators, memory, interconnect architecture, and energy efficiency may create technological or economic obsolescence before the end of an accounting useful life. A standardized sensitivity disclosure would permit investors to assess the earnings effect of management's useful-life assumptions.

This sensitivity information could also serve as an early-warning metric in relation to the long-lived asset impairment framework reflected in ASC 360, Impairment or Disposal of Long-Lived Assets. The proposed disclosure would not alter the recognition or measurement requirements of ASC 360. Rather, it would provide investors with decision-useful information concerning potential deterioration in economic life or productivity before circumstances result in an accelerated retirement, useful-life revision, or material lump-sum impairment charge in the financial statements.

### **V. Utilization and Economic Productivity**

Registrants should disclose consistently measured utilization information by material AI compute asset vintage, including revenue-producing customer workloads, internal production AI workloads, research and development workloads, reserved capacity, and idle capacity, subject to appropriate aggregation and protection of proprietary information.

Separating customer revenue-producing utilization from internal production and research workloads is important because aggregate compute utilization alone may not allow investors to assess commercial adoption or the revenue-producing productivity of material AI infrastructure.

Where reasonably measurable, registrants should also disclose an AI Compute Operating Contribution schedule consisting of AI-attributable revenue less AI compute depreciation, infrastructure energy and operating costs, direct AI compute operating costs, and directly attributable infrastructure support costs. The schedule should reconcile to the applicable GAAP segment revenue and operating income amounts.

Where AI-attributable revenue cannot reasonably be measured, the registrant should disclose that fact and explain the methodology used to evaluate the economic productivity of its AI infrastructure. The inability to isolate AI-attributable revenue should not, by itself, eliminate the asset-aging, depreciation-sensitivity, utilization, retirement, or impairment disclosures proposed in this petition.

## **VI. Economic Yield by Asset Vintage**

Where reasonably measurable, registrants should disclose pre-tax economic yield by major AI compute asset vintage. The measure should use the average net carrying amount over the reporting period, rather than a point-in-time ending balance, to improve period-to-period comparability and better align the denominator with the operating contribution generated during the period.

**Economic Yield = AI Compute Operating Contribution / Average Net Carrying Amount of AI Compute Assets During the Period**

The resulting measure could be presented by material in-service vintage. This disclosure would help investors evaluate whether older generations of AI infrastructure continue to produce adequate economic returns relative to their average carrying values and whether successive compute generations are producing improving or deteriorating economic yields.

## **VII. Relationship to GAAP Segment Reporting**

This petition does not propose that artificial intelligence automatically be treated as a separate GAAP reportable segment. The proposed disclosure is a supplemental subaccounting schedule supported by AI compute fixed-asset records and reconciled to existing GAAP segment information.

The objective is transparency regarding material assets, depreciation assumptions, utilization, and economic productivity, not the creation of a new operating-segment model or the prescription of business strategy. A supplemental disclosure approach would preserve existing GAAP segment-reporting requirements while providing investors with standardized information concerning a material class of rapidly evolving productive assets.

## **VIII. Requested Consideration**

I respectfully request that the Commission consider whether existing disclosure requirements provide investors with sufficient standardized information to evaluate the economic productivity, depreciation assumptions, technological obsolescence, and carrying values of material AI compute infrastructure.

I further request consideration of a rulemaking project, concept release, staff study, or coordinated consideration with the Financial Accounting Standards Board, as the Commission determines appropriate, to evaluate standardized AI compute asset aging, depreciation-sensitivity, utilization, and economic-yield disclosure.

This requested range of possible Commission actions is intended to permit incremental study and development of the disclosure issue and does not depend upon immediate adoption of a prescriptive final rule.

Respectfully submitted,

**Raymond Gillis**  
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