

# **Interactive Data – XBRL**

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## *Disclaimer*

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# *Interactive Data to Improve Financial Reporting*

Operating companies are required to file their financial statements in an interactive data format using the computer language called “XBRL” in addition to the traditional ASCII/HTML format.

Operating companies also are required to post interactive data on their corporate website, if they maintain one.

Interactive data is required to be filed as Exhibit 101 to periodic and other reports. The exhibit also is required in Securities Act registration statements that directly include financial statements (rather than incorporated by reference) after a price or price range has been determined.

Tagging requirements (Release No. 33-9002) do not alter disclosures previously required.

# *Three-year phase-in*

## LAF using US GAAP with public float >\$5 Billion:

Reports for periods ending on or after June 15, 2009:

- *Tag face financial statements and block tag each footnote*

Reports for periods ending on or after June 15, 2010:

- *Also tag significant accounting policies, tables and amounts in each footnote*

## All other LAF using US GAAP:

Reports for periods ending on or after June 15, 2010:

- *Tag face financial statements and block tag each footnote*

Reports for periods ending on or after June 15, 2011:

- *Also tag significant accounting policies, tables and amounts in each footnote*

## *Three-year phase-in*

All other filers using US GAAP and foreign private issuers using IFRS as issued by the IASB:

Reports for periods ending on or after June 15, 2011:

- *Tag face financial statements and block tag each footnote*

Reports for periods ending on or after June 15, 2012:

- *Also tag significant accounting policies, tables and amounts in each footnote*

***For domestic filers, the initial filing required to include the interactive data exhibit is a quarterly report on Form 10-Q. For foreign private issuers not using domestic forms, the initial filing required to include the interactive data exhibit is the annual report on Form 20-F or Form 40-F.***

# *Staff Observations*

## *Rendering*

### Overall comments on rendering

No requirement that the interactive data appear identical to the traditional format financial statements. (C&DI 130.08)

No requirement that tabular footnote information tagged at Level IV renders to appear like the tables in the traditional format financial statements. (FAQ 37)

Element labels must include parenthetical data so they conform to the traditional format financial statements. (Regulation S-T Rule 405(c)(1)(iii)(A) and Edgar Filer Manual (EFM) 6.11.1)

# *Staff Observations*

## *Rendering*

### Presentation Group guidance

EFM 6.7.12 requires that the tagged information be presented in this order: Level I, Level II, Level III and Level IV.

Labeling conventions for the presentation groups are illustrated on the following slides.

# *Staff Observations*

## *Rendering*

### **Presentation Group guidance Level I (FAQ 41)**

- **Footnote labels same as traditional format**

Document and Entity Information

Condensed Consolidated Balance Sheets

Condensed Consolidated Balance Sheets (Parenthetical)

Condensed Consolidated Statements of Income

Condensed Consolidated Statements of Cash Flows

Significant Accounting Policies

Cash and Cash Equivalents

Goodwill

Accrued Expenses

Segments



# *Staff Observations Rendering*

## **Presentation Group guidance Level II (FAQ 41)**

- **Traditional format label + (Policies)**

Significant Accounting Policies (Policies)

# *Staff Observations*

## *Rendering*

### **Presentation Group guidance Level III (FAQ 41)**

- **Traditional format label + (Tables)**

Cash and Cash Equivalents (Tables)

Goodwill (Tables)

Accrued Expenses (Tables)

Segments (Tables)

# *Staff Observations*

## *Rendering*

### **Presentation Group guidance for Level IV**

- **Traditional format label + (Details)**

Cash and Cash Equivalents (Details)

Goodwill (Details)

Accrued Expenses (Details)

Segments (Details)

# *Staff Observations Rendering*

## Presentation Group Summary

Document and Entity Information

Condensed Consolidated Balance Sheets

Condensed Consolidated Balance Sheets (Parenthetical)

Condensed Consolidated Statements of Income

Condensed Consolidated Statements of Cash Flows

Significant Accounting Policies

Cash and Cash Equivalents

Goodwill

Significant Accounting Policies (Policies)

Cash and Cash Equivalents (Tables)

Goodwill (Tables)

Accrued Expenses (Tables)

Segments (Tables)

Cash and Cash Equivalents (Details)

Goodwill (Details)

Accrued Expenses (Details)

Segments (Details)

# *Staff Observations*

## *Rendering*

**Element labels should match line item caption. (EFM 6.11.1)**

**Parentheticals should be included in label. (EFM 6.11.2)**

# *Staff Observations*

## *Rendering*

**No requirement that the interactive data appear identical to the traditional format financial statements. (C&DI 130.08)**

- **Indenting, fonts, underlining, subheadings**
- **Blank captions for totals**
- **Stockholders equity:**
  - **Brackets,**
  - **Column subtotals,**
  - **Ordering of columns and rows, and,**
  - **Axes are flipped.**

# Staff Observations Rendering

	2009	2008
Commitments and Contingencies	-	-
Commitments and Contingencies		
Notes Receivable	X,XXX	-
Preferred Stock (1,000 shares authorized, none Issued)	-	-
Preferred Stock (1,000 shares authorized, none Issued)		

- For Commitments and Contingencies and other line items appearing as a blank or a dash under all columns: Follow guidance in EFM 6.6.15; i.e., set nil attribute to true and don't tag the element with any information.
- For line items appearing as a blank or a dash under some but not all columns: For those columns, do not tag element.
- Alternatively, if a filer wants to tag one or more line items that appear as an empty field or a dash with a zero value because that's what management believes the item represents and they think the distinction is useful, they can choose to do so.
- This applies to all the financial statements, including the statement of shareholders' equity, the financial statement schedules, as well as to footnote data tagged at Level IV.

# *Taxonomy*

## XBRL US GAAP Taxonomies Viewer

2009 Release

### All Taxonomies

- Document and Company Information (all companies)
- Commercial and Industrial Taxonomy (most companies)
- Banking and Savings Institutions Taxonomy
- Brokers and Dealers Taxonomy
- Insurance Taxonomy
- Real Estate Taxonomy



# Taxonomy

The screenshot displays a web browser window with the address bar showing "http://viewer.xbrl.us - Public - All Taxonomies (2009 XBRL US GAAP Taxonomy (2009-01-31)) - Micros". Below the address bar is a "Taxonomy" dropdown menu. The main content area is titled "Network Browser" and contains two dropdown menus: "Network:" set to "Presentation" and "Lang:" set to "en-US". Below these menus is a list of taxonomies, each preceded by a plus sign and a gear icon. The list includes:

- 285000 - Disclosure - Interim Reporting
- 290000 - Disclosure - Accounting Policies
- 300000 - Disclosure - Cash and Cash Equivalents
- 320000 - Disclosure - Receivables, Loans, Notes Receivable, and Others
- 330000 - Disclosure - Investments, Debt and Equity Securities
- 330500 - Disclosure - Investments, Debt and Equity Securities (Alternative Presentation)
- 333000 - Disclosure - Investments, Equity Method and Joint Ventures
- 336000 - Disclosure - Investments, All Other Investments
- 340000 - Disclosure - Inventory
- 350000 - Disclosure - Deferred Costs, Capitalized, Prepaid, and Other Assets
- 360000 - Disclosure - Property, Plant, and Equipment
- 370000 - Disclosure - Intangible Assets, Goodwill and Other
- 400000 - Disclosure - Payables and Accruals
- 420000 - Disclosure - Asset Retirement Obligations
- 425000 - Disclosure - Environmental Remediation Obligations
- 430000 - Disclosure - Exit or Disposal Cost Obligations
- 440000 - Disclosure - Deferred Revenue
- 450000 - Disclosure - Commitment and Contingencies
- 456000 - Disclosure - Guarantees
- 460000 - Disclosure - Debt
- 470000 - Disclosure - Other Liabilities
- 472000 - Disclosure - Noncontrolling Interest
- 480000 - Disclosure - Temporary Equity
- 500000 - Disclosure - Equity
- 705000 - Disclosure - Compensation Related Costs, General
- 710000 - Disclosure - Compensation Related Costs, Share Based Payments
- 730000 - Disclosure - Compensation Related Costs, Retirement Benefits
- 740000 - Disclosure - Compensation Related Costs, Postemployment Benefits

# Taxonomy

http://viewer.xbrl.us - Public - Commercial and Industrial (2009 XBRL US GAAP Taxonomy (2009-01 - Microsoft Internet Explorer)

Taxonomy ▾ About Sign Up Login

Network Browser

Network: Presentation ▾ Lang: en-US ▾

- 104000 - Statement - Statement of Financial Position, Classified
  - Statement of Financial Position [Abstract]
    - Statement [Table]
      - Statement, Scenario [Axis]
      - Class of Stock [Axis]
      - Statement [Line Items]
        - Assets [Abstract]
          - Assets, Current [Abstract]
            - Cash, Cash Equivalents, and Short-term Investments [Abstract]
            - Receivables, Net, Current [Abstract]
            - Inventory, Net [Abstract]
              - Inventory, Finished Goods
              - Inventory for Long-term Contracts or Programs
              - Inventory, Work in Process
              - Inventory, Raw Materials
              - Other Inventory, Supplies
              - Other Inventory
              - Inventory Valuation Reserves
              - Inventory, LIFO Reserve
              - Inventory, Net, Total
            - Prepaid Expense, Current [Abstract]
            - Deferred Costs, Current [Abstract]
            - Derivative Instruments and Hedges, Assets [Abstract]
            - Assets Held-for-sale, Current [Abstract]
            - Capital Leases, Lessor Balance Sheet, Net Investment in Direct Financing
            - Deferred Tax Assets, Net, Current
            - Income Taxes Receivable, Current
            - Regulatory Assets, Current
            - Asset Recovery Damaged Property Costs, Current
            - Funds Held for Clients
            - Deferred Rent Asset, Net, Current

**Inventory, Net**

**Labels**

Type	Lang	Label
Standard Label	en-US	Inventory, Net
Documentation	en-US	Carrying amount (lower of cost or market) as of the balance sheet date of inventories less all valuation and other allowances. Excludes noncurrent inventory balances (expected to remain on hand past one year or one operating cycle, if longer).
Total Label	en-US	Inventory, Net, Total

**References**

This concept does not have any references.

**Properties**

Property	Value
Name	InventoryNet
Namespace	http://xbrl.us/us-gaap/2009-01-31
Data Type	xbri:monetaryItemType
XBRL Type	monetaryItemType
Substitution Group	xbri:item
Period Type	instant
Abstract	false
Nilable	true
Balance	debit

**Custom Type Information**

This concept does not have a custom type definition

Network Browser

Network: Presentation ▾ Lang: en-US ▾

- ⚙ 340000 - Disclosure - Inventory
- ⚙ 350000 - Disclosure - Deferred Costs, Capitalized, Prepaid, and Other Assets
- ⚙ 360000 - Disclosure - Property, Plant, and Equipment
- [-] [≡] Property, Plant and Equipment Disclosure [Text Block]
- [-] [A] Property, Plant and Equipment [Abstract]
  - [-] [≡] Property, Plant and Equipment [Text Block]
  - [-] [📄] Schedule of Property, Plant and Equipment [Table]
    - [-] [📊] Property, Plant and Equipment by Type [Axis]
      - [-] [≡] Property, Plant and Equipment, Type [Domain]
        - + [≡] Land and Building [Member]
        - + [≡] Machinery and Equipment [Member]
        - + [≡] Property, Plant and Equipment, Other Types [Member]
    - [-] [A] Property, Plant and Equipment [Line Items]
      - [≡] Property, Plant and Equipment, Useful Life, Minimum
      - [≡] Property, Plant and Equipment, Useful Life, Average
      - [≡] Property, Plant and Equipment, Useful Life, Maximum
    - [-] [A] Movement in Property, Plant and Equipment [Roll Forward]
      - [≡] Property, Plant and Equipment, Gross, Beginning Balance
      - [≡] Property, Plant and Equipment, Additions
      - [≡] Property, Plant and Equipment, Disposals

Taxonomy ▾

About Sign Up Login

Network Browser



Details

Relationships

Tree Locations

Network:  Lang:

- 333000 - Disclosure - Investments, Equity Method and Joint Ventures
- 336000 - Disclosure - Investments, All Other Investments
- 340000 - Disclosure - Inventory
  - Inventory Disclosure [Text Block]
    - Inventory, Net [Abstract]
      - Inventory, Gross [Abstract]
        - Inventory, Finished Goods and Work in Process [Abstract]
          - Inventory, Finished Goods
          - Inventory, Work in Process
          - Inventory, Finished Goods and Work in Process, Total
        - Inventory, Raw Materials and Supplies [Abstract]
          - Inventory, Raw Materials
          - Other Inventory, Supplies
          - Inventory, Raw Materials and Supplies, Total
        - Other Inventory [Abstract]
          - Inventory for Long-term Contracts or Programs
        - Inventory, Gross, Total
      - Inventory Adjustments [Abstract]
        - Inventory, Net, Total
    - Inventory, Net, Combining Work in Process and Raw Materials Alternative [Abstract]
    - Inventory, Net, Classification by Industry Alternative [Abstract]

Inventory, Gross

Labels

Type	Lang	Label
Standard Label	en-US	Inventory, Gross
Documentation	en-US	Carrying amount as of the balance sheet date of merchandise, goods, commodities, or supplies held for future sale or to be used in manufacturing, servicing or production process.
Total Label	en-US	Inventory, Gross, Total

References

Tools

Search



Internet

# *Staff Observations*

## *Element Selection*

**Element Selection is governed by Rule 405(c)(1)(iii) of Regulation S-T:**

c. 1. iii “Each data element contained in the Interactive Data File is matched with an appropriate tag from the most recent version of the standard list of tags specified by the EDGAR Filer Manual. A tag is appropriate only when its standard definition, standard label and other attributes as and to the extent identified in the list of tags match the information to be tagged.....”

**The EDGAR Filer Manual Sections 6.6.23 to 6.6.29 establishes a 5 step hierarchy for choosing the most appropriate element.**

# *Staff Observations*

## *Element Selection*

Consideration hierarchy in deciding between two or more elements in the USGAAP Taxonomy are:

- **Period type,**
- **Item Type,**
- **Documentation string (Std. Definition),**
- **Standard label string (Std. Label), and**
- **References.**

These element attributes should be considered in the order presented above. EFM 6.6.29

# Taxonomy

http://viewer.xbrl.us - Public - Commercial and Industrial (2009 XBRL US GAAP Taxonomy (2009-01 - Microsoft Internet Explorer)

Taxonomy ▾ About Sign Up Login

Network Browser

Network: Presentation ▾ Lang: en-US ▾

- 104000 - Statement - Statement of Financial Position, Classified
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            - Receivables, Net, Current [Abstract]
            - Inventory, Net [Abstract]
              - Inventory, Finished Goods
              - Inventory for Long-term Contracts or Programs
              - Inventory, Work in Process
              - Inventory, Raw Materials
              - Other Inventory, Supplies
              - Other Inventory
              - Inventory Valuation Reserves
              - Inventory, LIFO Reserve
              - Inventory, Net, Total
            - Prepaid Expense, Current [Abstract]
            - Deferred Costs, Current [Abstract]
            - Derivative Instruments and Hedges, Assets [Abstract]
            - Assets Held-for-sale, Current [Abstract]
            - Capital Leases, Lessor Balance Sheet, Net Investment in Direct Financing
            - Deferred Tax Assets, Net, Current
            - Income Taxes Receivable, Current
            - Regulatory Assets, Current
            - Asset Recovery Damaged Property Costs, Current
            - Funds Held for Clients
            - Deferred Rent Asset, Net, Current

**Inventory, Net**

**Labels**

Type	Lang	Label
Standard Label	en-US	Inventory, Net
Documentation	en-US	Carrying amount (lower of cost or market) as of the balance sheet date of inventories less all valuation and other allowances. Excludes noncurrent inventory balances (expected to remain on hand past one year or one operating cycle, if longer).
Total Label	en-US	Inventory, Net, Total

**References**

This concept does not have any references.

**Properties**

Property	Value
Name	InventoryNet
Namespace	http://xbrl.us/us-gaap/2009-01-31
Data Type	xbri:monetaryItemType
XBRL Type	monetaryItemType
Substitution Group	xbri:item
Period Type	instant
Abstract	false
Nilable	true
Balance	debit

**Custom Type Information**

This concept does not have a custom type definition

# *Staff Observations*

## *Element Selection*

### **1. Period type,**

- 2. Item Type,
- 3. Definition,
- 4. Standard label, and
- 5. References.

EFM 6.6.23: An element used in numeric facts representing amounts must have an `xbrli:periodType` attribute that is the same as the amounts reported.

Let's apply this rule:

1. Determine from the traditional format financial statements whether the fact is an **"instant" or "duration"**

- If the fact represented is measured at a point in time, it is "instant".
- All other facts are "duration".

Look at the choice of elements available for the line item in the traditional format financial statement and screen the choices available based on being "instant" or "duration". If the fact you are looking for is an instant only, consider those elements in the USGAAP taxonomy with an "instant" period type.



# *Staff Observations*

## *Element Selection*

1. Period type,
- 2. Item Type,**
3. Definition,
4. Standard label, and
5. References.

EFM 6.6.27: If there is a choice among different elements whose type attribute is consistent with a set of facts in one or more periods, use the element with the most specific type attribute.

Items Types include: **Monetary, Percent, Integer, Decimal, Shares, Per share, Text block and String**

Look at the choice of elements available and screen them based on being “instant” or “duration” then determine the most specific type attribute. If, for example, the fact in the traditional format financial statement is an instant and monetary only, consider those elements in the USGAAP taxonomy.

# Staff Observations

## Element Selection

1. Period type,
2. Item Type,
- 3. Definition,**
4. Standard label, and,
5. References.

EFM 6.6.24: Scope of the definition must include the amounts reported for that line item in the corresponding official HTML/ASCII document

EFM 6.6.25: Scope of the definition must not explicitly exclude one or more of the amounts in the corresponding official HTML/ASCII document

EFM 6.6.26: When there is a choice among different elements that have definitions consistent with a set of facts in one or more periods, use the element with the narrowest definition.

Lets apply these rules to three principles:

- 1. Definition must capture all concepts to be tagged,**
- 2. Definition *must not* exclude any concepts to be tagged,**
- 3. Use the element with the narrowest definition.**

Look at the choice of elements available and screen them based on being “instant” or “duration”. Then determine the most specific type attribute. Then look at the definition and determine that it *includes* all facts in that line item, and does *not exclude* any facts in the line item. Finally, if there is a choice between elements in the USGAAP taxonomy, use the element with the *narrowest* definition.

# *Staff Observations*

## *Element Selection*

Examples where a single concept in the traditional format financial statement is represented by a combination concept element in the US GAAP Taxonomy:

- 1. For line item, “Depreciation”** - Filer may be able to use the element “Depreciation, Depletion and Amortization.”
- 2. One footnote for “Organization” and one for “Basis of Presentation.”** Do not use standard element “Organization, Consolidation, and Presentation of Financial Statements.” Filer must create custom elements for both.

# *Staff Observations*

## *Element Selection*

- **Standard element with a narrower definition appears more appropriate**
- Example: “Paid in Capital” when “Paid in Capital, Common Stock” may be more appropriate.
  
- **Standard element with a broader definition appears more appropriate**
- Example: “Long term debt” Text Block where “Debt disclosure” element may be more appropriate as Long and Short Term debt is mentioned in the note.
  
- **New element created, but a standard element appears appropriate**
- Example is the extension “Salaries wages and benefits” when standard element “Labor and Related Expenses” may be more appropriate.
  
- **Standard element used, but a new element should have been created**
- For example, using the tag “Prepaid expenses” for the line item “Prepaid expenses and other current assets.”

# *Staff Observations*

## *Extensions*

### **Custom Element for “Interest and Other Income, Net”**

Period type: **Duration**

Item type: **Monetary**

Balance type: **Credit**

Definition: **Interest and other income, net of other expenses.**

Standard Label: **Interest and Other Income, Net**

Element Name: **InterestAndOtherIncomeNet**

Reference: *Prohibited*

# *Staff Observations - Extensions*

## **Stock-based compensation**

<i>Cost of revenues</i>	<i>\$100</i>
<i>Marketing expense</i>	<i>50</i>
<i>Development</i>	<i><u>25</u></i>
<i>Total</i>	<i><u>175</u></i>

*Definition – stock-based compensation associated w/  
marketing*

*Period type – Duration*

*Item type – Monetary*

*Balance type – Credit*

*Value entered – negative 50 with label negated*

# Staff Observations

## Negative Items

### Do you really mean to enter a negative value?

- First, decide whether to tag an element with a positive or negative value based on the element's standard definition and balance attribute.
- Standard Taxonomy is designed so that most elements will be tagged with positive values.
- Treasury stock on balance sheet has debit balance attribute while other stockholder's equity accounts have credit balance attributes.

# Staff Observations

## Negated Items

### Do you really mean to negate the label?

- Negate the label (reverse the sign) only to change whether an amount is rendered within brackets.
- Default position in Standard Label Link Base is set to “positive.”
- A positive value will render without brackets unless label is negated.
- A negative value will render within brackets unless label is negated.



# Staff Observations on Level II Tagging

## S-T Rule 405 (d)(2)

Each significant accounting policy within the significant accounting policies footnote must be block-text tagged.

# *Staff Observations*

## **Level II Tagging – Considerations**

Find and tag each significant accounting policy appearing in the footnotes.

Often there will be more than one reasonable way to tag significant accounting policies.

The “best” tagging approach will depend on the filer’s particular facts and circumstances.

A filer’s headings and subheadings included in the footnote may be useful guides in determining how to tag the information.

Each paragraph in the significant accounting policies footnote does not necessarily need to be separately tagged.

# Significant Accounting Policies Footnote

## A. Revenue Recognition:

10 paragraphs

6 ¶s describe product revenues

3 ¶s describe franchise fees

1 ¶s describe shipping and handling

## B. Cash and Cash Equivalents **and** Short Term Investments:

Comingled discussion of classification issues relating to cash and cash equivalents **and** short term investments.

# Staff Observations on Level III Tagging

## S-T Rule 405 (d)(3)

Each table within each footnote must be block-text tagged.

# *Staff Observations – Level III*

## **Note 12: Inventory**

	2009	2008
Raw Materials	X,XXX	X,XXX
Work in Process	X,XXX	X,XXX
Finished Goods	X,XXX	X,XXX
Total	X,XXX	X,XXX

Extend for this text block

# Staff Observations – Level III

## Note 24: Segments

	9 months	9 months	3 months	3 months
<b>Income statement data</b>	2009	2008	2009	2008
Revenues Domestic	X,XXX	X,XXX	X,XXX	X,XXX
Revenue international	X,XXX	X,XXX	X,XXX	X,XXX
Net loss domestic	X,XXX	X,XXX	X,XXX	X,XXX
Net loss international	X,XXX	X,XXX	X,XXX	X,XXX

<b>Balance sheet data</b>			2009	2008
Total Assets			X,XXX	X,XXX
Domestic			X,XXX	X,XXX
International			X,XXX	X,XXX
Total			X,XXX	X,XXX

May use one or two Text Blocks

# Staff Observations – Level III

## Note 12: Inventory

### Filer 1

	2009	2008
Raw Materials	X,XXX	X,XXX
Work in Process	X,XXX	X,XXX
Finished Goods	X,XXX	X,XXX
Total	X,XXX	X,XXX

Single Text Block

### Filer 2

	2009
Raw Materials	X,XXX
Work in Process	X,XXX
Finished Goods	X,XXX
Total	X,XXX

	2008
Raw Materials	X,XXX
Work in Process	X,XXX
Finished Goods	X,XXX
Total	X,XXX

May use one or  
two Text Blocks

# Staff Observations – Level III

## NOTE 6 FAIR VALUE MEASUREMENTS

### Assets and Liabilities Measured at Fair Value on a Recurring Basis

The following table presents our assets and liabilities at December 31, 2010, which are measured at fair value on a recurring basis:

(In millions)

	Level 1	Level 2	Level 3	Gross Fair Value	FIN No. 39 Netting <sup>(a)</sup>	Net Fair Value
<b>Assets</b>						
Mutual funds	\$ 982	\$ -	\$ -	\$ 982	\$ -	\$ 982
Commercial paper	-	2,601	-	2,601	-	2,601
Certificates of deposit	-	555	-	555	-	555
U.S. Government and Agency securities	7,134	6,105	-	13,239	-	13,239
Foreign government bonds	501	3,022	-	3,523	-	3,523
Mortgage-backed securities	-	3,593	-	3,593	-	3,593
Corporate notes and bonds	-	4,073	253	4,326	-	4,326
Municipal securities	-	256	-	256	-	256
Common and preferred stock	4,218	28	5	4,251	-	4,251
Derivatives	5	623	5	633	(235)	398
Total	\$12,840	\$20,856	\$263	\$33,959	\$(235)	\$33,724
<b>Liabilities</b>						
Derivatives	\$ 5	\$ 344	\$ -	\$ 349	\$(231)	\$ 118

(a) FIN No. 39, *Offsetting of Amounts Related to Certain Contracts – an interpretation of APB No. 10 and FASB Statement No. 105*, permits the netting of derivative assets and derivative liabilities when a legally enforceable master netting agreement exists. These amounts include fair value adjustments related to our own credit risk and counterparty credit risk.

May use single or multiple text blocks



## *Level IV Tagging*

### S-T Rule 405(d)(4):

Footnotes must be tagged. Within each footnote:

1. Each amount (i.e., monetary value, percentage, and number) must be tagged; and
2. Each narrative disclosure may be tagged separately to the extent the filer chooses.

# *Staff Observations – Level IV*

## **Note 12: Inventory**

	2010	2009
Raw Materials	X,XXX	X,XXX
Work in Process	X,XXX	X,XXX
Finished Goods	X,XXX	X,XXX
Total	X,XXX	X,XXX

# Staff Observations – Level IV

## Types of Property, Plant and Equipment [Domain]

### Domain Members

### Line Items

	Land [Member]	Buildings [Member]	Furniture and Fixtures [Member]	Construction in Progress [Member]	Total
Property, Plant and Equipment, Gross					
Accumulated Depreciation, Depletion and Amortization, Property Plant and Equipment					
Property, Plant and Equipment, Net, Total					

### Facts

- Use the standard elements and structures even if the table format is different from the traditional format financial statements. (FAQ 38)

# *Staff Observations – Level IV*

## Extract of Traditional format PP&E table

Land	X,XXX
Buildings	X,XXX
Furniture and Fixtures	X,XXX
Construction in Progress	X,XXX

## Dimensional table format

	Land [Member]	Buildings [Member]	Furniture and Fixtures [Member]	Construction in Progress [Member]
Property, Plant and Equipment, Gross	X,XXX	X,XXX	X,XXX	X,XXX

## *Level IV Tagging*

The tagging of some numbers that appear in a footnote is outside the contemplation of the rule – examples:

- Docket Number 34-4589
- 22nd District Court
- Altitude of 27,000 feet
- Drilling 700 feet
- Competitors within 2 miles from our existing stores
- Founded a new subsidiary in 2009
- Each restaurant offers at least 20 entrees
- Returns of 1% fat milk were immaterial
- Popularity of our \$1.99 breakfast special
- FASB Codification Section 605-40-15
- Note 5, Acquisitions

## *Level IV Tagging*

**This debt instrument has a variable interest rate of LIBOR plus 1%, which is reset monthly.**

*Create custom percent item-type element for “percentage above LIBOR”*

**The useful lives of fixed assets range from 3 to 5 years.**

*Tag upper and lower end of range separately with decimal item-type elements*

## *Inventory Footnote*

**This example is not intended to represent a complete footnote disclosure. Information has been extracted and summarized for the purpose of illustrating certain mapping and rendering issues.**

# *Inventory – Traditional Format*

## **Note 7 - Inventory**

The components of inventory were as follows:

	Year ended December 31,	
(in millions)	<u>2010</u>	<u>2009</u>
Raw materials	\$200	\$400
Work in process	75	50
Finished goods	<u>425</u>	<u>450</u>
Total	<u>\$700</u>	<u>\$900</u>



# Inventory - Level I

7. INVENTORY	12 Months Ended																					
<b>Notes to Financial Statements:</b>	Dec. 31, 2010																					
INVENTORY	<p data-bbox="1365 730 1764 779" style="text-align: center;"><u>NOTE 7 INVENTORY</u></p> <p data-bbox="1197 836 1953 933">The components of inventory were as follows:</p> <p data-bbox="1470 1023 1638 1055" style="text-align: center;">(in millions)</p> <table border="1" data-bbox="1197 1071 1953 1396"><thead><tr><th data-bbox="1197 1071 1711 1136"></th><th data-bbox="1711 1071 1837 1136">December 31,</th><th data-bbox="1837 1071 1953 1136">2010</th><th data-bbox="1953 1071 2058 1136">2009</th></tr></thead><tbody><tr><td data-bbox="1197 1136 1711 1201">Raw materials</td><td data-bbox="1711 1136 1837 1201"></td><td data-bbox="1837 1136 1953 1201">\$200</td><td data-bbox="1953 1136 2058 1201">\$400</td></tr><tr><td data-bbox="1197 1201 1711 1266">Work in process</td><td data-bbox="1711 1201 1837 1266"></td><td data-bbox="1837 1201 1953 1266">75</td><td data-bbox="1953 1201 2058 1266">50</td></tr><tr><td data-bbox="1197 1266 1711 1331">Finished goods</td><td data-bbox="1711 1266 1837 1331"></td><td data-bbox="1837 1266 1953 1331">425</td><td data-bbox="1953 1266 2058 1331">450</td></tr><tr><td data-bbox="1197 1331 1711 1396">Total</td><td data-bbox="1711 1331 1837 1396"></td><td data-bbox="1837 1331 1953 1396"><u>\$700</u></td><td data-bbox="1953 1331 2058 1396"><u>\$900</u></td></tr></tbody></table>			December 31,	2010	2009	Raw materials		\$200	\$400	Work in process		75	50	Finished goods		425	450	Total		<u>\$700</u>	<u>\$900</u>
	December 31,	2010	2009																			
Raw materials		\$200	\$400																			
Work in process		75	50																			
Finished goods		425	450																			
Total		<u>\$700</u>	<u>\$900</u>																			

# *Inventory - Level III*

## **7. INVENTORY (Tables)**

**12 Months Ended**

**Dec. 31, 2010**

### **Notes to Financial Statements:**

Inventory (table)

(in millions)

December 31,	2010	2009
Raw materials	\$200	\$400
Work in process	75	50
Finished goods	425	450
Total	<u>\$700</u>	<u>\$900</u>

## *Inventory - Level IV*

<b>7. INVENTORY (Details) (USD \$) In Millions</b>	<b>Dec. 31, 2010</b>	<b>Dec. 31, 2009</b>
<b>Inventory</b>		
Raw materials	\$ 200	\$ 400
Work in process	75	50
Finished goods	425	450
<b>Total</b>	<b>\$ 700</b>	<b>\$ 900</b>

<b>Balance Sheets (USD \$) In Millions</b>	<b>Dec. 31, 2010</b>	<b>Dec. 31, 2009</b>
<b>Current assets:</b>		
Inventory	\$ 700	\$ 900

## *Fair Value Footnote*

**This example is not intended to represent a complete footnote disclosure. Information has been extracted and summarized for the purpose of illustrating certain mapping and rendering issues.**

# Fair Value – Traditional Format

## NOTE 6 FAIR VALUE MEASUREMENTS

### Assets and Liabilities Measured at Fair Value on a Recurring Basis

The following table presents our assets and liabilities at December 31, 2010, which are measured at fair value on a recurring basis:

(In millions)

	Level 1	Level 2	Level 3	Gross Fair Value	FIN No. 39 Netting <sup>(a)</sup>	Net Fair Value
<b>Assets</b>						
Mutual funds	\$ 982	\$ –	\$ –	\$ 982	\$ –	\$ 982
Commercial paper	–	2,601	–	2,601	–	2,601
Certificates of deposit	–	555	–	555	–	555
U.S. Government and Agency securities	7,134	6,105	–	13,239	–	13,239
Foreign government bonds	501	3,022	–	3,523	–	3,523
Mortgage-backed securities	–	3,593	–	3,593	–	3,593
Corporate notes and bonds	–	4,073	253	4,326	–	4,326
Municipal securities	–	256	–	256	–	256
Common and preferred stock	4,218	28	5	4,251	–	4,251
Derivatives	5	623	5	633	(235)	398
Total	\$12,840	\$20,856	\$263	\$33,959	\$(235)	\$33,724
<b>Liabilities</b>						
Derivatives	\$ 5	\$ 344	\$ –	\$ 349	\$(231)	\$ 118

(a) FIN No. 39, *Offsetting of Amounts Related to Certain Contracts – an interpretation of APB No. 10 and FASB Statement No. 105*, permits the netting of derivative assets and derivative liabilities when a legally enforceable master netting agreement exists. These amounts include fair value adjustments related to our own credit risk and counterparty credit risk.

# Fair Value – Traditional Format (continued)

## Changes in Level 3 Instruments Measured at Fair Value on a Recurring Basis

The majority of our Level 3 instruments consist of investment securities classified as available-for-sale with changes in fair value included in other comprehensive income. The following table presents the changes in Level 3 instruments measured on a recurring basis for the year ended December 31, 2010:

(In millions)

	Corporate Notes and Bonds	Common and Preferred Stock	Derivative Assets	Total
Balance, beginning of period	\$138	\$ 8	\$ 71	\$217
Total realized and unrealized gains (losses):				
Included in other income (expense)	(6)	(6)	51	39
Included in other comprehensive income	111	–	–	111
Purchases, issuances, and settlements	–	5	(119)	(114)
Transfers in (out)	10	(2)	2	10
Balance, end of period	<u>\$253</u>	<u>\$ 5</u>	<u>\$ 5</u>	<u>\$263</u>
Change in unrealized gains (losses) included in other income (expense) related to assets held as of December 31, 2010	<u>\$ (7)</u>	<u>\$ (5)</u>	<u>\$ 4</u>	<u>\$ (8)</u>

## Assets and Liabilities Measured at Fair Value on a Nonrecurring Basis

We measure certain assets, including our cost and equity method investments, at fair value on a nonrecurring basis. These assets are recognized at fair value when they are deemed to be other-than-temporarily impaired. At December 31, 2010, the fair value of the common and preferred stock that we held that was required to be measured at fair value on a non-recurring basis was \$164 million. This fair value was determined using models with significant unobservable inputs.

In accordance with the provisions of Accounting Principles Board Opinion No. 18, *The Equity Method of Accounting for Investments in Common Stock*, we review the carrying values of our investments when events and circumstances warrant, and we consider all available evidence in evaluating when declines in fair value are other than temporary. The fair values of our investments are determined based on valuation techniques using the best information available, and may include quoted market prices, market comparables, and discounted cash flow projections. An impairment charge is recorded when the cost of the investment exceeds its fair value and this condition is determined to be other than temporary. During the fiscal year ended December 31, 2010, impairment charges of \$86 million were recognized for certain investments measured at fair value on a nonrecurring basis as the decline in their respective fair values below their cost was determined to be other than temporary in all instances.

# Fair Value – Level I

6. FAIR VALUE MEASUREMENTS	12 Months Ended					
	Dec. 31, 2010					
<b>Notes to Financial Statements:</b>						
FAIR VALUE MEASUREMENTS						
	Assets and Liabilities Measured at Fair Value on a Recurring Basis					
	The following table presents our assets and liabilities at December 31, 2010, which are measured at fair value on a recurring basis:					
	(in millions)					
	Level 1	Level 2	Level 3	Gross Fair Value	FIN No. 39 Netting <sup>(a)</sup>	Net Fair Value
<b>Assets</b>						
Mutual funds	\$982	\$ -	\$ -	\$982	\$ -	\$982
Commercial paper	-	2,601	-	2,601	-	2,601
Certificates of deposit	-	555	-	555	-	555
U.S. Government and Agency securities	7,134	6,105	-	13,239	-	13,239
Foreign government bonds	501	3,022	-	3,523	-	3,523
Mortgage-backed securities	-	3,593	-	3,593	-	3,593
Corporate notes and bonds	-	4,073	253	4,326	-	4,326
Municipal securities	-	256	-	256	-	256
Common and preferred stock	4,218	28	5	4,251	-	4,251
Derivatives	5	623	5	633	(235)	398
<b>Total</b>	<u>\$12,840</u>	<u>\$20,856</u>	<u>\$263</u>	<u>\$33,959</u>	<u>\$(235)</u>	<u>\$33,724</u>
<b>Liabilities</b>						
Derivatives	<u>\$ 5</u>	<u>\$ 344</u>	<u>\$ -</u>	<u>\$ 349</u>	<u>\$(231)</u>	<u>\$ 118</u>
(a)	FIN No. 39, <i>Offsetting of Amounts Related to Certain Contracts - an interpretation of APB No. 10 and FASB Statement No. 105</i> , permits the netting of derivative assets and derivative liabilities when a legally enforceable master netting agreement exists. These amounts include fair value adjustments related to our own credit risk and counterparty credit risk.					

# Fair Value – Level I (continued)

## Changes in Level 3 Instruments Measured at Fair Value on a Recurring Basis

The majority of our Level 3 instruments consist of investment securities classified as available-for-sale with changes in fair value included in other comprehensive income. The following table presents the changes in Level 3 instruments measured on a recurring basis for the year ended December 31, 2010:

(in millions)

	Corporate Notes and Bonds	Common and Preferred Stock	Derivative Assets	Total
Balance, beginning of period	\$138	\$ 8	\$ 71	\$217
Total realized and unrealized gains (losses):				
Included in other income (expense)	(6)	(6)	51	39
Included in other comprehensive income	111	-	-	111
Purchases, issuances, and settlements	-	5	(119)	(114)
Transfers in (out)	10	(2)	2	10
Balance, end of period	\$253	\$ 5	\$ 5	\$263
Change in unrealized gains (losses) included in other income (expense) related to assets held as of December 31, 2010	\$ (7)	\$ (5)	\$ 4	\$ (8)

## Assets and Liabilities Measured at Fair Value on a Nonrecurring Basis

We measure certain assets, including our cost and equity method investments, at fair value on a nonrecurring basis. These assets are recognized at fair value when they are deemed to be other-than-temporarily impaired. At December 31, 2010, the fair value of the common and preferred stock that we held that was required to be measured at fair value on a non-recurring basis was \$ 164 million. This fair value was determined using models with significant unobservable inputs.

In accordance with the provisions of Accounting Principles Board Opinion No. 18, *The Equity Method of Accounting for Investments in Common Stock*, we review the carrying values of our investments when events and circumstances warrant, and we consider all available evidence in evaluating when declines in fair value are other than temporary. The fair values of our investments are determined based on valuation techniques using the best information available, and may include quoted market prices, market comparables, and discounted cash flow projections. An impairment charge is recorded when the cost of the investment exceeds its fair value and this condition is determined to be other than temporary. During the fiscal year ended December 31, 2010, impairment charges of \$ 86 million were recognized for certain investments measured at fair value on a nonrecurring basis as the decline in their respective fair values below their cost was determined to be other than temporary in all instances.



# Fair Value – Level III

6. FAIR VALUE MEASUREMENTS (Tables)	12 Months Ended						
Notes to Financial Statements:	Dec. 31, 2010						
Assets and liabilities measured on a recurring basis (table)	(In millions)						
	Level 1	Level 2	Level 3	Gross Fair Value	FIN No. 39 Netting <sup>(a)</sup>	Net Fair Value	
<b>Assets</b>							
Mutual funds	\$982	\$ -	\$ -	\$982	\$ -	\$982	
Commercial paper	-	2,601	-	2,601	-	2,601	
Certificates of deposit	-	555	-	555	-	555	
U.S. Government and Agency securities	7,134	6,105	-	13,239	-	13,239	
Foreign government bonds	501	3,022	-	3,523	-	3,523	
Mortgage-backed securities	-	3,593	-	3,593	-	3,593	
Corporate notes and bonds	-	4,073	253	4,326	-	4,326	
Municipal securities	-	256	-	256	-	256	
Common and preferred stock	4,218	28	5	4,251	-	4,251	
Derivatives	5	623	5	633	(235)	398	
<b>Total</b>	<b>\$12,840</b>	<b>\$20,856</b>	<b>\$263</b>	<b>\$33,959</b>	<b>\$(235)</b>	<b>\$33,724</b>	
<b>Liabilities</b>							
Derivatives	\$ 5	\$ 344	\$ -	\$ 349	\$(231)	\$ 118	
	<p>(a) FIN No. 39, <i>Offsetting of Amounts Related to Certain Contracts - an interpretation of APB No. 10 and FASB Statement No. 105</i>, permits the netting of derivative assets and derivative liabilities when a legally enforceable master netting agreement exists. These amounts include fair value adjustments related to our own credit risk and counterparty credit risk.</p>						
Changes in level 3 Instruments Measured at Fair Value on a Recurring Basis (Table)	(In millions)						
			Corporate Notes and Bonds	Common and Preferred Stock	Derivative Assets	Total	
Balance, beginning of period			\$138	\$ 8	\$ 71	\$217	
Total realized and unrealized gains (losses):							
Included in other income (expense)			(6)	(6)	51	39	
Included in other comprehensive income			111	-	-	111	
Purchases, issuances, and settlements			-	5	(119)	(114)	
Transfers in (out)			10	(2)	2	10	
Balance, end of period			<b>\$253</b>	<b>\$ 5</b>	<b>\$ 5</b>	<b>\$263</b>	
Change in unrealized gains (losses) included in other income (expense) related to assets held as of December 31, 2010			<b>\$ (7)</b>	<b>\$ (5)</b>	<b>\$ 4</b>	<b>\$ (8)</b>	

# Fair Value – Level IV

6. FAIR VALUE MEASUREMENTS (Details) (USD \$) In Millions	Dec. 31, 2010
<b>Assets:</b>	
Mutual funds	\$ 982
Commercial paper	2,601
Certificates of deposit	555
U.S. Government and Agency securities	13,239
Foreign government bonds	3,523
Mortgage-backed securities	3,593
Corporate notes and bonds	4,326
Municipal securities	256
Common and preferred stock	4,251
Derivatives, Assets	398
Fair Value of Assets Measured on a Recurring Basis	33,724
<b>Liabilities:</b>	
Derivatives, Liabilities	118
<b>Level 1</b>	
<b>Assets:</b>	
Mutual funds	982
U.S. Government and Agency securities	7,134
Foreign government bonds	501
Common and preferred stock	4,218
Derivatives, Assets	5
Fair Value of Assets Measured on a Recurring Basis	12,840
<b>Liabilities:</b>	
Derivatives, Liabilities	5
<b>Level 2</b>	

<b>Level 2</b>	
<b>Assets:</b>	
Commercial paper	2,601
Certificates of deposit	555
U.S. Government and Agency securities	6,105
Foreign government bonds	3,022
Mortgage-backed securities	3,593
Corporate notes and bonds	4,073
Municipal securities	256
Common and preferred stock	28
Derivatives, Assets	623
Fair Value of Assets Measured on a Recurring Basis	20,856
<b>Liabilities:</b>	
Derivatives, Liabilities	344
<b>Level 3</b>	
<b>Assets:</b>	
Corporate notes and bonds	253
Common and preferred stock	5
Derivatives, Assets	5
Fair Value of Assets Measured on a Recurring Basis	263
<b>Gross Fair Value</b>	

<b>Gross Fair Value</b>	
<b>Assets:</b>	
Mutual funds	982
Commercial paper	2,601
Certificates of deposit	555
U.S. Government and Agency securities	13,239
Foreign government bonds	3,523
Mortgage-backed securities	3,593
Corporate notes and bonds	4,326
Municipal securities	256
Common and preferred stock	4,251
Derivatives, Assets	633
Fair Value of Assets Measured on a Recurring Basis	33,959
<b>Liabilities:</b>	
Derivatives, Liabilities	349
<b>FIN No. 39 Netting</b>	
<b>Assets:</b>	
Derivatives, Assets	(235) <sup>[1]</sup>
Fair Value of Assets Measured on a Recurring Basis	(235) <sup>[1]</sup>
<b>Liabilities:</b>	
Derivatives, Liabilities	\$ (231) <sup>[1]</sup>

[1] FIN No. 39, *Offsetting of Amounts Related to Certain Contracts - an interpretation of APB No. 10 and FASB Statement No. 105*, permits the netting of derivative assets and derivative liabilities when a legally enforceable master netting agreement exists. These amounts include fair value adjustments related to our own credit risk and counterparty credit risk.

## *Fair Value – Level IV (continued)*

6. FAIR VALUE MEASUREMENTS, Details 2 (USD \$) In Millions	12 Months Ended	
	Dec. 31, 2010	Dec. 31, 2009
<b>Level 3 Assets [Roll Forward]</b>		
Balance, beginning of period	\$ 217	
<b>Total realized and unrealized gains (losses):</b>		
Included in other income (expense)	39	
Included in other comprehensive income	111	
Purchases, issuances, and settlements	(114)	
Transfers in (out)	10	
Balance, end of period	263	217
Change in unrealized gains (losses) included in other income (expense) related to assets held	(8)	
<b>Corporate Notes and Bonds</b>		
<b>Level 3 Assets [Roll Forward]</b>		
Balance, beginning of period	138	
<b>Total realized and unrealized gains (losses):</b>		
Included in other income (expense)	(6)	
Included in other comprehensive income	111	
Transfers in (out)	10	
Balance, end of period	253	138
Change in unrealized gains (losses) included in other income (expense) related to assets held	(7)	
<b>Common and Preferred Stock</b>		

<b>Common and Preferred Stock</b>		
<b>Level 3 Assets [Roll Forward]</b>		
Balance, beginning of period	8	
<b>Total realized and unrealized gains (losses):</b>		
Included in other income (expense)	(6)	
Purchases, issuances, and settlements	5	
Transfers in (out)	(2)	
Balance, end of period	5	8
Change in unrealized gains (losses) included in other income (expense) related to assets held	(5)	
<b>Derivative Assets</b>		
<b>Level 3 Assets [Roll Forward]</b>		
Balance, beginning of period	71	
<b>Total realized and unrealized gains (losses):</b>		
Included in other income (expense)	51	
Purchases, issuances, and settlements	(119)	
Transfers in (out)	2	
Balance, end of period	5	71
Change in unrealized gains (losses) included in other income (expense) related to assets held	\$ 4	

## *Fair Value – Level IV (continued)*

<b>6. FAIR VALUE MEASUREMENTS, Details 3 (USD \$) In Millions</b>	<b>12 Months Ended</b>
	<b>Dec. 31, 2010</b>
<b>Fair Value, Assets Measured on Nonrecurring Basis:</b>	
Cost and Equity Method Investments, Fair Value Disclosure	\$ 164
Impairment Charges Recognized, Fair Value Disclosure	\$ 86

# *Contacts and Resources*

**XBRL.SEC.GOV**

**Ask-OID@SEC.GOV**

## March 23, 2010 Webcast Panel Discussion

<http://www.sec.gov/news/otherwebcasts/2010/xbrlseminar032310-discussion.htm>

## 2009 Staff Observations From Review of Interactive Data F/S

<http://www.sec.gov/spotlight/xbrl/staff-review-observations.shtml>

## Compliance and Disclosure Interpretations

<http://www.sec.gov/divisions/corpfin/guidance/interactivedatainterp.htm>