

REQUEST FOR INFORMATION **PURSUANT TO FAR 15.202(e)**

INTRODUCTION

The U. S. Securities and Exchange Commission (SEC) is developing its requirements for filing of paper reports. The purpose of this Request for Information (RFI) is to gather information to assist the SEC in formulating its requirements, and identify qualified quoters who are able to meet our requirements.

The SEC is open to alternative ideas. Respondents are encouraged to provide information about alternatives that can help the SEC better define its requirements and obtain a contract management solution that meets its needs.

BACKGROUND

For most of its 72 year history, the U.S. Securities and Exchange Commission has required the filing of paper reports. Since the 1980s, the very same paper reports are filed in electronic form, but the information remains static. Beginning this year, the U. S. Securities and Exchange Commission is encouraging the submission of unofficial financial statements and other reports using interactive data.

By using computer codes to "tag" different kinds of data in financial reports, the information companies file with the Commission can be made much easier to find and analyze. For example, specific items in a financial statement, such as net income or gross sales, are given computer-readable labels. At the same time, the task of preparing the reports can be automated for the companies who file them.

Interactive data relies on standard definitions to "tag" various kinds of information, turning SEC financial reports that have previously been text-only into documents that can be retrieved through computer searches, and analyzed in a variety of spreadsheet programs and analytical software. The data can also be more readily used to compare companies' financial performance, and better identify "outliers" that could represent attractive investment opportunities – or increased risk of misstatements or fraud.

The use of interactive data, if widely adopted, could dramatically enhance the usefulness of reported financial information. Consumers of the data would be able to use it more easily and effectively. Potentially, computer-tagged data could provide real-time operational information for business managers. And its instant availability could dramatically streamline and accelerate the collection and reporting of that same financial information to the SEC and the public.

For now, this is a voluntary program, to allow filers, the SEC, and the users of SEC reports to test the process. For filers, this means an opportunity to assess the benefits and costs of using interactive data. For the SEC, it means evaluating the Commission's ability to process and store documents in Extensible Business Reporting language, or XBRL -- the computer language used in the SEC pilot program that makes interactive data possible. For users of SEC reports, it will afford

an opportunity to consider the value added from interactive data, as well as to pilot various software applications to take advantage of the new flexibility in using the information.

The current program was inaugurated a few months ago, on February 3, 2005, when the SEC adopted rule amendments formally establishing the XBRL Voluntary Program. This new program allows for the voluntary submission of XBRL documents as exhibits to certain periodic reports and investment company act filings.

PURPOSE OF REQUEST FOR INFORMATION

The U. S. Securities and Exchange Commission (SEC) is assessing whether the use of tagged data in SEC filings would provide a better means to obtain and analyze necessary information from registrants. Concept Release 33-8417, <http://www.sec.gov/rules/concept/33-8497.htm>. In furtherance of that effort, on February 3, 2005, the SEC adopted rule amendments establishing the XBRL Voluntary Filing Program on EDGAR, which allows for the voluntary submission of XBRL-formatted exhibits with certain periodic reports. Final Release 33-8529, <http://www.sec.gov/rules/final/33-8529.htm>. The XBRL Voluntary Filing Program was established to allow:

- the filing community to test the submission of XBRL documents,
- the SEC to examine the processing and storage of XBRL documents,
- the dissemination community to receive XBRL documents and to consider or pilot value added services,
- the investing community to download XBRL documents and explore their use, and
- the SEC staff to investigate and pilot various mechanisms to view and analyze the XBRL-tagged information.

The purpose of this Request for Information (RFI) is to help the SEC meet the original goals of the Voluntary Filing Program, and in particular to assist the SEC staff to identify and assess mechanisms for viewing and analyzing submitted data. We are using the RFI to gather additional information to help the SEC to understand the capabilities of XBRL and related software packages and to identify qualified vendors who might be able to meet our future requirements.

While this RFI focuses on XBRL, the SEC remains open to alternative ideas and considerations, as the Concept Release indicated. Respondents are encouraged to provide information, about XBRL or alternative methodologies that can help the SEC better understand the potential of using tagged data formats and assess whether solutions exist that might meet its needs.

DESCRIPTION OF INFORMATION REQUESTED

All vendors with an appropriate product relating to the requirements set forth in the Potential Requirements Table attached hereto are invited to submit a Capability Statement and contact information. The Capability Statement should discuss the product's capabilities as against the potential requirements, the product's system requirements, the product's integration specification (if available), and any other specific and pertinent information that would enhance the SEC's

understanding of the information submitted. Also, vendors with a GSA schedule should provide the contract number of that schedule.

Respondents should also complete the Potential Requirements Table which contains provisional requirements for the SEC's XBRL and tagged data initiative. We recognize that not all requirements may be met by a single software system. Please indicate in your response which capabilities can be provided via commercial off the shelf software versus custom developed solutions. For requirements that are met by commercial off the shelf software, please also include the product name, release number and release date of the software.

DISCLAIMER

This RFI is issued solely for information and planning purposes and does not constitute a solicitation. In accordance with FAR 15.202(e), responses to this notice are not offers and cannot be accepted by the Government to form a binding contract. Respondents are solely responsible for all expenses associated with responding to this RFI. Respondents needing confidential treatment for any proprietary information they furnish must comply with the SEC's confidential treatment regulations at 17 C.F.R. 200.83. Responses to this RFI will not be returned. Respondents will not be notified of the result of the review.

HOW TO RESPOND

Please submit your response to this RFI via email to Amy Alvarey at alvareya@sec.gov, phone 202.551.7313, by Friday, December 2, 2005, at 10:00 A.M. EST.

POTENTIAL REQUIREMENTS TABLE

#	Vendor Name/Product: <i>(fill in vendor name/product)</i>	Provide Capability Y/N	Comments
Requirements			
High Level			
1	The system shall be fully compliant with the XBRL Specification Version 2.1		
2	The system shall provide a user interface that does not require advanced knowledge of XML or XBRL.		
Rendering			
3	The system shall be able to create a presentation report for XBRL instance documents that are styled comparably to the reports (e.g., balance sheet, income statement) from which the XBRL data was derived.		
4	The system shall be able to create presentation reports for XBRL instance documents based on the standard taxonomies utilized for the SEC's Voluntary Filing Program on the EDGAR system as well as those referring to company extensions.		
5	The system shall be able to create presentation reports based on all of the data included in the instance document without any deletion, summarization or other changes.		
6	The system shall be able to save the presentation reports to standard file format outputs (e.g. HTML, etc).		
Data Analysis			
7	The system shall be able to perform financial and data		

#	Vendor Name/Product: <i>(fill in vendor name/product)</i> Requirements	Provide Capability Y/N	Comments
	analysis on a single XBRL instance document or comparisons across a range of XBRL instance documents for one or multiple companies.		
8	The data analysis shall include the ability to apply mathematic operations to the data, or specify certain non-numeric data for comparison.		
9	The system shall be able to include data reported in XBRL instance documents based on either the standard taxonomies used for the SEC's Voluntary Filing Program on the EDGAR system or company extension taxonomies.		
10	The system shall be able to perform analysis based on all of the data included in the instance document without any deletion, summarization or other changes.		
11	The system shall be able to analyze the contexts for the data being analyzed and compare data based on comparable contexts across XBRL Instance documents.		
12	The system shall provide a user-friendly mechanism to create a set of rules, ratios and key measures to be analyzed and apply the criteria against one or many instance documents.		
13	The system shall be able to indicate where the use of company extension taxonomies may affect the comparability of data, including the ability to analyze the changes/additions made to the standard taxonomies via the company extension taxonomy.		

#	Vendor Name/Product: <i>(fill in vendor name/product)</i> Requirements	Provide Capability Y/N	Comments
14	The system shall be able to allow users to choose which labels to display as part of the analysis including those provided in a company extension taxonomy.		
15	The system shall be able to indicate whether data is based on elements found in the standard taxonomies vs. the extension taxonomies		
XBRL Analysis			
16	The system shall be able to validate XBRL documents against the XBRL Specification Version 2.1 and applicable best practices guidance (e.g., Financial Reporting Taxonomy Architecture)		
17	The system shall be able to analyze the changes between two versions of a company's XBRL document (including both taxonomies and instance documents) and provide a report on the changes.		
18	The system shall be able to summarize and report significant statistics from an instance document, including but not limited to: list of taxonomies used, contexts used, number of elements tagged by context and by taxonomy.		
19	The system shall be able to summarize and report significant statistics from company extension taxonomies, including but not limited to: new elements added, custom labels added to elements from the base taxonomies, relationships added or changed for elements in the base taxonomies.		