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Re: Due Process handbook for XBRL activities

Dear Olivier Servais,

The due process handbook provides a dire needed insight into the process of creating the XBRL taxonomy. I do, however, have a few comments that I would like to share with you.

Regarding the consultation moments the XBRL-team has incorporated to evaluate the taxonomy that is being created; from the process it is still unclear what kind of effect these comments will amount to. It would be helpful if this was made clear and that the decision making of the XBRL-team does not remain a black-box.

Regarding the timeline of the creation process; at this moment the creation of accounting rules and the actual distribution of the taxonomy needs a considerable amount of time. For market adoption of the rules the taxonomy is not essential but the added value of such a product lies in the implementation of the rules in such a product. Ergo, the taxonomy should be made available shortly after the accounting rules are declared usable by the governments and not when the rules are made public.

Regarding changing the internal key on elements used in the taxonomy; if the accounting rules do not change from year to year there is no need for the representing elements to change. If, however, the rules are changed a strategy of extending the existing taxonomy or releasing a completely new taxonomy have to be considered. When using extensions it is impossible to delete elements, there are only options to deprecate these elements. It is also impossible to correct some of the meta-data connected to elements (i.e. its attributes) in an extension. Extensions also lead to a mass of taxonomies in a couple of years' time which doesn't exactly help its transparency.

New versions of the taxonomy appearing consistent with the publication of new accounting rules represent the 'old way' of distributing a new bound volume on paper. Every book in itself represents the total of all the rules and so does the taxonomy. This poses an additional burden on implementers since their mapping tables have to be updated even if it is only the URI that changes. A versioning solution from XII may be of great value but the implementation would require a recommendation status versioning specification, assisting software that can handle versioning files and mapping tables that are aimed at being supported by versioning mechanisms. Since these requirements are not yet met, it may have to be considered to differentiate the dictionary part of the taxonomy from the validation part and apply strict rules in which case an element key can be updated, so the majority of the elements can remain untouched over years to come.

I hope you can improve the due process handbook with all the comments that have been brought forward and I'm looking forward to our continuous collaboration in creating a valuable taxonomy for the financial world.

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Kind regards,

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