

Tel: +44 144 282 6248

Elm House
Wigginton
TRING, Herts.
HP23 6HU
United Kingdom

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CESR Secretariat, Paris

Dear Sirs

Consultation on the Development of Pan-European Access to Financial Information
Disclosed by Listed Companies

Some years ago I was involved in an informal working group in London, which was addressing the inconsistencies actually found in disseminated Financial Information.

We identified that different wholesalers / distributors were making different assumptions / interpretations re: the disclosure source documentation, thus leading to inconsistencies in the information eventually reaching participants / individuals via multiple sources.

We concluded that, if Financial Information Disclosures could be standardised onto XBRL-enabled templates, this could eliminate the different assumptions / interpretations. Moreover, a representative of Adobe Systems held that it is perfectly possible to XBRL-enable any template configured in Adobe Acrobat – thereby producing consistent printed and machine-readable outputs.

Our working group saw this as an ideal solution, considering that there would be an 'almost zero' implementation cost for the Listed Companies themselves (and on the basis that any significant costs would be an obstacle).

Please get back to me if I can be of any further assistance in this matter.

Yours faithfully,

A P Jenkins.