



The Association for
Accountants and
Financial Professionals
in Business

September 24, 2010

The Committee on European Securities Regulators
11-13 avenue de Friedland
75008 PARIS
FRANCE

**Re: Consultation on Development of Pan-European Access to Financial
Information Disclosed by Listed Companies**

The Institute of Management Accountants (IMA®) is one of the world's leading professional associations for accountants and financial professionals in business serving as trusted advisors in driving sustainable performance while protecting investor/stakeholder interests. With over 60,000 members in 125 countries, IMA is one of the original founding members of the XBRL standard and is a direct member of XBRL International, the global standard setting body for XBRL. IMA is focused on the uses of XBRL for both external and internal reporting needs, since both are important to improve transparency, risk management, reporting insights and integrity, and other tangible benefits associated with this open standard.

The IMA XBRL Committee welcomes the opportunity to show its support for the Committee on European Securities Regulators (CESR) Consultation on Development of Pan-European Access to Financial Information Disclosed by Listed Companies as you assemble market feedback on this important topic and work to develop prospective guidance and regulations regarding corporate performance reporting.

In June 2009, the IMA XBRL Committee was formed to raise general awareness about XBRL globally, educate management accountants/finance professionals about XBRL, and demonstrate the value of XBRL internally in value-adding business activities, including but not limited to internal business reporting and analysis (e.g., operational reporting, balanced scorecards and dashboards), risk management and internal controls, business intelligence and data mining, transaction processing and consolidations. The Committee is comprised of globally recognized leaders in the XBRL and business communities. For more information, please visit <http://linkupima.com/groups/7eab42efae/summary>.

10 Paragon Drive
Suite 1
Montvale, NJ 07645
www.imanet.org



The Association for
Accountants and
Financial Professionals
in Business

September 24, 2010

The Committee on European Securities Regulators
11-13 avenue de Friedland
75008 PARIS
FRANCE

Page Two

The IMA XBRL Committee is helping to build awareness of XBRL and communicating the value of the standard to improve transparency and business analysis quality. We offer supportive comments in the following areas:

- Standardized Context Enhances Information Transparency
- Market Collaboration Facilitates Development of a Broad Reporting Framework
- Supply Chain Standardization Enhances Process Effectiveness

Standardized Context Enhances Information Transparency

XBRL International, Inc. (XII) is a not-for-profit, standard-setting body and open-market consortium of 650 organizations around the world that have collaboratively developed XBRL. XII promotes XBRL adoption globally and has produced a variety of specifications and taxonomies to support an open standard, XML dialect for describing business information and related resources. XBRL taxonomies relevant to the external reporting requirements in countries around the world are publicly available, and government agencies use them for both mandatory and voluntary programs.

Historically, “transparency” has largely been a synonym for “available;” however, information may be publicly available yet practically inaccessible to a range of investors and analysts. A critical and pervasive issue impacting the cost of information transparency is the function of its accessibility as well as its reusability. It may be useful for CESR to consider incrementally improving transparency by improving its accessibility and reusability. A more complete assessment of transparency might be stated as:

Information Transparency = Availability + Accessibility + Reusability

Traditional paper and electronic annual reports, proxies and press releases of publicly traded corporations include many important disclosures; however, the cost of accessing and reusing this information for analysis is high because the process commonly requires considerable manual effort and time. Locating relevant information embedded in lengthy narrative disclosures and numerous explanatory footnotes, and then subjecting it to manual access, parsing and reuse processes, may require many hours, if not days, of reasonably tedious work from highly skilled people.

10 Paragon Drive
Suite 1
Montvale, NJ 07645
www.imanet.org



The Association for
Accountants and
Financial Professionals
in Business

September 24, 2010

The Committee on European Securities Regulators
11-13 avenue de Friedland
75008 PARIS
FRANCE

Page Three

Despite information's public availability, the high cost of access and reuse hinders its transparency, essentially resulting in an environment of largely opaque disclosures. For many retail investors, this puts these relevant corporate disclosures economically out of reach.

Information reuse is significantly improved through standardized context for disclosure elements so that consumers can pull it apart and reconstruct it for their own analysis. XBRL makes this process possible without loss of context while eliminating the manual access, parsing and reuse associated with currently unstructured formats. XBRL taxonomies define the context for information elements and provide a specific definition, similar to how the Universal Product Code defines retail products – we refer to this as “content with context.” XBRL taxonomies relate information elements to specific definitions, such that each element can be quickly accessed and analyzed without distorting the context of the overall communication or document that it was created within.

Transparency is not simply about the availability of information; investors and analysts seek to cost effectively reuse the information within their own individual analytical perspectives on company disclosures. Available XBRL taxonomies are the basis for regulatory reforms, which can be expected not only to increase transparency but also lower costs by enabling more automated preparation and reuse. As supply chain standardization enhances transparency, automation will replace current manual efforts to access, populate, develop and maintain analytical applications.

Aside from facilitating automated access and reuse, XBRL also enables standardized formulas or models. Complete analytical models can be shared, developed and enhanced among colleagues or members of a social network or group thereby enhancing the overall effectiveness of market analytical capability across a broader range of consumers.

Market Collaboration Facilitates Development of a Broad Reporting Framework

Corporate performance is realized through a company's own method of value creation by combining their particular financial and non-financial attributes. Raising the transparency of how a company prospectively generates corporate performance is an important market objective.

10 Paragon Drive
Suite 1
Montvale, NJ 07645
www.imanet.org



The Association for
Accountants and
Financial Professionals
in Business

September 24, 2010

The Committee on European Securities Regulators
11-13 avenue de Friedland
75008 PARIS
FRANCE

Page Four

It is relevant for companies to explain their non-financial attributes and value chain in order to reveal their specific value creation mechanisms, while relating its corporate performance in business reporting. This combination of financial and non-financial disclosures contributes to enhancing the overall transparency of corporate disclosures relevant to the independent analysis of their corporate performance.

However, many legislative reporting requirements dictate a wide range of non-financial information (e.g. paragraph 14 of COM (2010) 243). Such rules require information disclosures from the viewpoint of raising the awareness of relevant social values and may exceed the extent necessary to provide transparent disclosures related to corporate performance. Many types of corporate information are required disclosures from each organization including NGOs, resulting in somewhat redundant disclosures along with significant increase in compliance costs. This outcome is contrary to the EU administrative burden reduction program objectives.

To ensure that required non-financial information disclosures are relevant, some form of open market dialogue between company management and their stakeholder community is suggested. This can be seen in efforts surrounding ESG (environmental, social and governance) information reporting whereby companies that are effective at doing so undertake strong efforts in an ongoing dialogue. This helps the organization and its disclosures be more relevant to stakeholders and the market.

Supply Chain Standardization Enhances Process Effectiveness

Improvements in the format of company disclosures provided within a broader reporting framework enhance the overall transparency and usefulness of relevant information. While this is clearly the case for externally reported disclosures, it is also applicable to the related internal information and processes supporting enterprise management decision making.

10 Paragon Drive
Suite 1
Montvale, NJ 07645
www.imanet.org



The Association for
Accountants and
Financial Professionals
in Business

September 24, 2010

The Committee on European Securities Regulators
11-13 avenue de Friedland
75008 PARIS
FRANCE

Page Five

In considering the potential impact of the Commission Transparency initiative it may be useful to assess the compliance process and convergence implications of the XBRL-enabled Standard Business Reporting ("SBR") Projects currently under way in the Netherlands, Poland, Spain, Belgium, Australia and Singapore (and soon to be China). These SBR projects provided a more effective compliance solution for both company and regulatory processes via a converged set of standardized information requirements and more automated access, validation, analysis and reporting processes.

Enabling the continued migration of these supply chain standardization concepts throughout enterprise infrastructures provide for more effective enterprise management AND external reporting processes. A more standardized business information supply chain enhances both management decision-making as well as the agility of risk management at the corporate and market levels. As with the UPC/bar code, the transparency and analysis of supply chain business information processes are enhanced for all market and company management participants.

The IMA XBRL Committee thanks you for an opportunity to share our thoughts on the value of transparent financial information. Our Committee is available to discuss with you any of the points within our letter of support. IMA is expanding its regional presence in Europe, and in fact, expect to open an office soon in Zurich. We also look forward to the discussion around the OAM on this Consultation.

Sincerely,

A handwritten signature in black ink that reads "Kim R. Wallin". The signature is written in a cursive, flowing style.

The Honorable Kim R. Wallin, CMA, CFM, CPA
Controller, State of Nevada
Chair, IMA XBRL Committee
KWALLIN@controller.state.nv.us

10 Paragon Drive
Suite 1
Montvale, NJ 07645
www.imanet.org