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Denver, CO, 80202

June 9, 2017

Susan M. Cospers, Technical Director
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

File Reference No. 2017-230

Dear Ms Cospers,

idaciti, Inc (“idaciti”) appreciates this opportunity to comment on the effectiveness and efficiency of the US GAAP Financial Reporting Taxonomy (“UGT”). As a financial data technology company that consumes the XBRL data which is the end product of the UGT, idaciti fully supports the FASB’s initiative to improve the taxonomy and measure its effectiveness and efficiency.

To that end, our comments are anchored on the one major premise that we believe makes the UGT effective and efficient – the effect of the taxonomy on producing high data quality. We believe that in order to achieve that goal to ensure wide market adoption of this data, the taxonomy must support the following tenets: accurate data, complete data and comparable data. The Invitation to Comments lists out a number of areas and questions, we will direct our response to Question 3 that pertains to “Taxonomy References to the Codification”.

In particular, we underscore the importance of the point outlined in paragraph 1.46 that element selection from the UGT should be based on the reporting requirements of the Codification. Consequently, we agree that efficient and appropriate element selection would be ensured and fewer extensions and inappropriate element selection would be produced. Current industry practice suggests that a disclosure checklist that mirrors the Codification requirements is generally used by both the registrants and their auditors in the periodic filing process. This common practice can naturally be extended to element selection from the UGT if the Codification references are accurately and completely represented in the UGT elements. If registrants diligently apply the disclosure checklist requirements of the Codification, and if the Codification references are accurately and completely reflected in the UGT elements, this would result in more appropriate and optimal selection of the elements to reflect the underlying US GAAP disclosure

requirements.

The absence of complete and accurate Codification references in the UGT elements means that registrants do not have the necessary clarity when it comes to appropriate element selection to tag the US GAAP disclosure requirements. Given the flexibility afforded to registrants to use the UGT elements in the way they see fit (with no constraints limiting the use of elements in the particular presentation or calculation hierarchy as modeled in the taxonomy), the Codification references hold the additional valuable information (beyond the other element meta data like definitions and attributes) to convey the intended semantic meaning of an element. The incongruence between Codification disclosure requirements and the Codification references in the UGT elements means that filers are not selecting UGT elements in an accurate or consistent way that necessarily reflects disclosure requirements or GAAP. This does not produce high quality data that can be easily and seamlessly consumable by data consumers.

In summary, responding to Question 3, we believe that completion of the reference project would increase the efficiency and effectiveness of taxonomy usage (both in terms of reducing uncertainty in element selection by filers and increasing data quality for the end data consumer). Completion of this project should be a high priority.

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine Tan". The signature is stylized with a large initial "C" and a long horizontal stroke at the end.

Christine Tan, PhD
Chief Research Officer and Co-Founder
idaciti, Inc.