

Data Quality Committee

Public Exposure Comments 7/16/15 through 9/14/15

Element Values Are Equal (DQC_0004)

| Comment | Response |
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| "Element Values Are Equal" does not really describe this correctly. This is more about facts within the exact same context being equal. | Global Rule Logic addresses this. Rules only run for elements within the same context unless the rule specifically states otherwise. |
| Hope the rule will consider the exception- for filers with liquidation basis of accounting, there are Assets, Liabilities and Net Assets concepts, but it won't report Stockholders Equity, i.e, there is no "LiabilitiesAndStockholdersEquity" concept. | Global Rule Logic addresses this. The rule will not run when an element is not reported. |
| Will this rule be able to calculate through dimensions? | Global Rule Logic addresses this. Rules only run for elements within the same context unless the rule specifically states otherwise. |
| Differences can occur due to rounding. An accurate filing is based on full precision without adjusting ("plugging") rounded amounts. The current rule does not fully support the most accurate disclosure of amounts. | Recommend to update rule to provide a tolerance (e.g., 2) |

DEI and Block Tag Date Contexts (DQC_0006)

| Comment | Response |
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| The periods should be updated to be a specific range for each period, plus and minus 15 days, as example rather than some specific dates based on a sample period(s). | Recommend to update rule to adjust a range of period dates to use +/-15 days. |
| Consider an exclusion for those forms 10-KT and 10-QT in the application of this rule. | Recommend to update rule, these (T) filing types should be excluded. |
| This rule should consider exception for companies that are incorporated during the year. | Rule currently flags false positives for companies with shorter periods due to incorporation during the year. Recommend update to rule submission form to explain that this is an exception to the rule and not an error. |
| Assuming the content is reported for both "Parent" and "Subsidiary" company in the same document, the rule would be processed inconsistent with EFM v34 rule 6.6. | Open question. |

Element A must be less than or equal to Element B (DQC_0009)

| Comment | Response |
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| Apart from the list given, we can apply this rule for elements related to Future minimum lease payments, Future amortization expense and long term debt maturities. | Recommend to add to backlog of future rules to be tested. |
| The rule would be effective if the following method of reconciling is incorporated as well. Element A = Element B + Dimension C | Current rule only addresses the default. Recommend to add to backlog of future rules to be tested. |

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| <p>e.g.,</p> <p>1) Preferred Stock, Shares Outstanding (Context 1) = Shares, Outstanding + Preferred Stock [Member] (Context 1)</p> <p>2) Common Stock, Shares Outstanding (Context 1) = Shares, Outstanding + Common Stock [Member] (Context 1)</p> | |
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Negative Values (DQC_0015)

| Comment | Response |
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| Should consider adding the Equity component Members (on Equity Components [Axis]) to the Member Exclusions list to allow the value of the element to be negative. | Recommend to update rule to exclude all Members when they appear on the Statement Equity Components [Axis]. Will analyze members and member/line item combinations for future inclusion in DQC_0015. |
| <p>Please consider adding the following members to DQC_0015_MemberExclusions.</p> <p>Adjustments for New Accounting Pronouncements [Axis] / New Accounting Pronouncement, Early Adoption, Effect [Member]</p> <p>Scenario [Axis] / Pro Forma [Member]</p> <p>Legal Entity [Axis] / Parent Company [Member]</p> <p>Legal Entity [Axis] / Subsidiaries [Member]</p> <p>Legal Entity [Axis] / Guarantor Subsidiaries [Member]</p> <p>Legal Entity [Axis] / Non-Guarantor Subsidiaries [Member]</p> | <p>Accounting Pronouncements is covered under existing rule (Adjustment is included in rule).</p> <p>Where Parent, Subsidiaries, Guarantor and Non-Guarantor [Members] exist on the Legal Entity [Axis] will update rule to add them on axis/member exclusion list. Will consider whether to recommend a change to EFM rule 6.6.13.</p> <p>Disagree with comment to include Scenario [Axis]/Proforma [Member] because these usually indicate a modeling problem not a false positive.</p> |

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| <p>Negative errors for those members [in the previous comment] occur when companies do inter-company eliminations incorrectly. Exclusions should not be added for these. The correct solution is to fix their accounting figures for inaccurate inter-company eliminations.</p> | <p>No action</p> |
| <p>Please consider adding exemption for the element us-gaap_ProvisionForLoanLossesExpensed.</p> | <p>Recommend update rule to exclude this element from rule. Will consider a revision to the rule for estimates where negative values do not represent a reversal.</p> |
| <p>Exclusions should not be made for reductions due to reversals. Theoretically, any and all facts can have reversals and that means that all elements would be excluded.</p> | <p>Current rule excludes elements that are estimates. Will consider a revision to the rule for estimates where negative values do not represent a reversal.</p> |
| <p>There are situations where AOCI reclassification disclosures are for amounts including portion attributable to noncontrolling interest, amount attributable to noncontrolling interest only, or reclassification of other components of OCI.</p> <p>Instead of adding other AOCI members to the DQC_0015_MemberExclusions, consider exempting Reclassification out of Accumulated Other Comprehensive Income [Axis] / Reclassification out of Accumulated Other Comprehensive Income [Member] from the rule.</p> | <p>Recommend update rule to add Reclassification to list of member exclusions.</p> |
| <p>Is this list of elements exhaustive? There are many more elements apart from this list where negative numbers cannot be used. For e.g. the following elements qualify for this rule as well. If required, we can look at identifying such additional elements. us-gaap_DirectOperatingCosts</p> | <p>List was not intended to be all inclusive. Will be adding more elements in the future.</p> |

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| us-gaap _ExplorationCosts us-gaap _GeneralInsuranceExpense us-gaap _FuelCosts us-gaap _FreightCosts us-gaap _InventoryWriteDown | |
| Member Exclusions: There are no members that contain the text “Consolidations.” While there are two members that contain “Consolidation,” this exemption to the rule is not necessary because one of those two members also contains “Adjustment” and the other contains “Eliminations.” | No action needed. |

Document Period End Date Context (DQC_0033)

| Comment | Response |
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| The value of dei:DocumentPeriodEndDate, the value of the “endDate” of the context of that concept, and the current balance sheet date should all be the same. I would propose taking this rule one step further to include the notion that these two dates should also be consistent with the current balance sheet date. | Discussed with commenter who concurred that no action is needed. |

General Feedback on Public Exposure Drafts

| Comment | Response |
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| Fundamental Accounting Concepts should be incorporated into validation rules. | Will consider whether to add rules that are designed to determine whether expected calculation relationships exist for certain standard elements. |
| There is a need to apply only a group of rules to certain types of entities. | Will be specific to the rule. |

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| Concern that certain rules may result in less accuracy by not using full precision. | Global Rule Logic addresses this. Tolerance will be built into rules as applicable. |
| Suggest that the Data Quality Committee include members of the preparer community to make sure that the filers' SEC filing expertise, opinion and practical experience is taken into consideration when drafting proposed guidance and validation rules for public exposure and review. | Open |
| New rules should be implemented using the existing XBRL linkbases for which specifications are already available. We would oppose including validation rules in a different environment than the Calculation linkbase and the Formula linkbase especially since the capabilities of the Formula linkbase have not yet been exhausted within the US GAAP Taxonomy. We urge the Committee to comply with these existing specifications. | There are rules in the DQC's backlog that use the Calculation linkbase. With respect to the comment regarding the use of the Formula linkbase, the DQC will discuss the Rule Implementation Code. |
| We request that the Committee list the technical specifications for XBRL engines to process the recommended rules. | To be covered in meeting under Rule Implementation Code session. |