



March 17, 2011

Mr. Olivier Servais
IASC Foundation XBRL Team
30 Cannon Street
London EC4M 6XH
United Kingdom

RE: Exposure Draft IFRS Taxonomy 2011

Dear Mr. Servais:

The American Institute of Certified Public Accountants (AICPA) is pleased to provide comments to the Exposure Draft of the IFRS Taxonomy 2011 (IFRS Taxonomy).

The AICPA is the world's largest association representing the accounting profession, with nearly 370,000 members in 128 countries representing many areas of practice, including business and industry, public practice, government, education and consulting. As a founder of XBRL, the AICPA continues to serve as an actively engaged member of the XBRL Consortia and promote the global adoption of XBRL. We appreciate the opportunity to comment on this proposal on behalf of our members.

In 2009, the U.S. Securities Exchange Commission (SEC) adopted final rules that require companies to submit their financial statements to the SEC in interactive data format using XBRL. Commencing with fiscal periods on or after June 15, 2011, foreign private issuers that prepare their financial statements in accordance with International Financial Reporting Standards (IFRS), as issued by the International Accounting Standards Board (IASB) will be required to comply with these rules. It is expected that these filers would reference the IFRS Taxonomy to tag their financial statements for submission to the SEC.

We commend the IFRS Foundation's efforts to further develop its IFRS taxonomy and the improvements that have been made to date in order to provide investors with more transparency and better access to financial information. However, it remains unclear at this point whether this taxonomy will be able to meet the needs of foreign private issuers in complying with the SEC's rules. As of the date of this letter, the SEC has yet to announce the effective date of the IFRS Taxonomy and notify filers of their ability to submit interactive data for financial statements prepared in accordance with IFRSs as issued by the IASB. Therefore, such foreign private issuers are currently unable to submit their XBRL-formatted financial information to the SEC.

As cited in the results of the *IFRS Foundation Pilot XBRL Initiative with Public Companies Listed in the US* (Pilot XBRL Initiative), participants who tagged their 20-F filings found that they needed to create additional taxonomy items (i.e., IFRS

Taxonomy extensions) to reflect common-practice concepts. Additionally, many of the extensions were created with the same meaning in spite of the fact that they were technically different. Furthermore, participants tagged their filings at Level 1 only, which entailed tagging the elements on the face of the financial statements and block tagging each note. The second year of tagging under the SEC rules requires detail tagging of the financial statement notes and schedules, which not only increases the amount of elements tagged in the XBRL files, but also adds more complexity. Without an expanded taxonomy (i.e. one that includes a robust set of tags for common-practice concepts as well as footnote disclosures), foreign private issuers will need to create even more extensions for their second year submissions. The use of significant extensions may impact the usability of the data for consumers of these files.

The need to create extensions may be further increased for foreign private issuers because the IFRS Taxonomy does not yet fully cover industry specific elements or commonly reported concepts, and because it lacks standard definitions. Although the creation of some extensions is important in enabling companies to customize their disclosures where necessary in order to effectively communicate with investors and other stakeholders, extensions should only be utilized to differentiate information rather than to communicate commonly reported items. The overuse of extensions in the absence standard definitions and taxonomy elements for industry-specific and commonly reported concepts will make it more difficult for investors to analyze and compare disclosures among companies, thereby limiting the usefulness of the XBRL data.

It is our recommendation that expanded elements for commonly reported concepts and standard definitions be added to the IFRS Taxonomy in order for it to better meet the needs of filers and consumers of XBRL tagged data, not only under the SEC rules but around the world.

On behalf of the AICPA, thank you for the opportunity to comment. If you have any questions regarding the comments in this letter, please contact Amy Pawlicki at 212-596-6083, apawlicki@aicpa.org.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Barry C. Melancon". The signature is fluid and cursive, with a long horizontal stroke at the end.

Barry C. Melancon, CPA
President and CEO
AICPA