

May 15, 2025

Austin Gerig
Director/Chief Data Officer,
Securities and Exchange Commission
c/o Tanya Ruttenberg
100 F Street, NE,
Washington, DC 20549

Re: Request for Comments
Proposed Collection; Comment Request; Extension: Interactive Data
FR Doc. 2025-05274

Introduction

The calculation for the internal time burden of submitting in XBRL is given without context as the time burden of alternatives for digitally submitting data to the SEC is marginal once an exchange format for “apples to apples” is formalized. The true cost of internal time burden should encompass a broader analysis of internal time spent *and saved*.

Background

Private industry and their representative trade associations, along with multiple public agencies have been actively developing XBRL data interoperability for next generation infrastructure. New products and services will leverage AI enabled by XBRL to create innovative new ways to reduce costs and increase resiliency.

Public agencies, private entities and trade associations are collaborating on the implementation of data interoperability with initiatives like the DOE [Orange Button](#), USDOT [Accelerating Advanced Digital Construction Management Systems](#) (ADCMS) program, NREL [SolarApp](#) and [Caltrans BIM for Infrastructure](#) (BIM4I) so that software systems of stakeholders across industry segments can exchange project data “apples to apples” as part of an open standards based digital ecosystem.

Internal Time Savings

The current calculation of an internal time burden of 53.1 hours spent per XBRL export to SEC should include the time saved by the entity related to the implementation of XBRL for importing data.

Example, utilities and private energy developers are exchanging data on a daily basis with their design team, contractors, suppliers and others. A significant component is financial data exchange that is transitioning to XBRL because of its universality across industry segments.

The time savings for an entity that can efficiently import XBRL data from its counterparties over the inefficient current process will not only far surpass the 53.1 hours per response, but provide far greater data integrity as the data imported will be using the same taxonomy as the data exported to the SEC.

Summary

The time saving from XBRL being implemented and adopted by counterparties that ultimately generate the data being submitted to the SEC will be significant with the added benefit of the SEC and investors receiving high integrity data.

Other data exchange alternatives provide no distinguishable time savings, and only XBRL provides quantifiable time savings with data integrity.

Comments

(a) whether this proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;

The practical utility of XBRL over any other digital option is data capture commences early, can encompass all counterparties and supply chain and remains throughout the lifecycle of assets being reported.

(b) the accuracy of the agency's estimate of the burden imposed by the collection of information;

The accuracy of the time burden for data sent to SEC is wrong. It does not properly reflect the internal time saving of implementing XBRL because it fails to recognize the time saved by importing XBRL data.

(c) ways to enhance the quality, utility, and clarity of the information collected; and

Encourage public and private entities to continue implementing XBRL for engaging in digital ecosystems so that data generated by importing aligns with the data exported to SEC.

(d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

Stakeholders that are Accelerating Advanced Digital Construction Management Systems will be creating the data that ultimately gets reported the SEC. The acceleration to digital platforms that can engage in digital ecosystems enabled by XBRL will provide system developers the ability to innovate next generation platforms for a next generation economy.

Summary

The SEC should continue its outreach efforts to engage stakeholders in the value proposition that XBRL represents, identify where within Treasury XBRL can be implemented to further engage stakeholders and use that engagement to better quantify what the *total time savings* are, and what the *cost/benefit* is to each stakeholder including the integrity of the data from multiple counterparties.

A handwritten signature in blue ink, appearing to read 'K. Dixon Wright'.

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