

IASCF XBRL Team
International Accounting Standards Committee Foundation
30 Cannon Street
London EC4M 6XH
United Kingdom

13 August 2009

Dear Mr. Servais,

PricewaterhouseCoopers appreciates the opportunity to comment on the IASCF Requests for Information on "Extending the Use of Dimensions in the IFRS Taxonomy" and "Concept Naming and Change Management in the IFRS Taxonomy."

Following consultation with members of the PricewaterhouseCoopers network of firms, this response summarizes the views of member firms on this Discussion Paper.

"PricewaterhouseCoopers" refers to the network of member firms of PricewaterhouseCoopers International Limited, each of which is a separate and independent legal entity.

Overall comments

This letter includes comments on both the "Concept Naming and Change Management in the IFRS Taxonomy" and "Extending the Use of Dimensions in the IFRS Taxonomy" Request for Information ("Requests").

These Requests may not address all taxonomy concepts relevant to future market adoption of IFRS Taxonomies, particularly the: current scope of the IFRS Taxonomy as it is limited to disclosure concepts outlined in the IASB Bound Volume ("Bound Volume"); and the timing and frequency of taxonomy releases.

We believe that the IFRS taxonomy would be improved if it were extended to include common use disclosures which are broader than the mandatory or specific disclosure requirements outlined in the IASB Bound Volume. The current IFRS taxonomy articulates relatively few detailed note disclosures. Because of the nature of IFRS there are many commonly used disclosures by companies. Incorporating these within the taxonomy would allow for the representation of a comprehensive set of IFRS disclosures to be represented in the XBRL format. The creation of common note disclosure elements for a broad range

of companies, countries or industries, would enhance international transparency and comparability, which are among the major potential benefits of the IFRS XBRL Taxonomy. One way to achieve this objective would be for the IASB to encourage the collaborative market development of common use disclosure elements.

For the IFRS taxonomy and any extensions to be useful in a global context, it is important that the timing of the release of the taxonomy be closely aligned to the release of the Bound Volume. At present, there is too long a time period between the release of the Bound Volume and application of the standard to the release of the IFRS taxonomy. Expediting this process would give software developers, users and other market stakeholders more time to implement and test the taxonomy prior to its required application in their respective markets.

Concept Naming and Change Management in the IFRS Taxonomy

Q(a) Which of the options (R1, R2, R3) should be implemented for the architecture of the IFRS Taxonomy with regards to the renaming of concepts? Please note that only one option may be selected. Please provide the reason for your decision as well your assessment of the benefits and costs of the selected option.

We believe that the preferred option is the R2 Current US GAAP and EDINET Approach wherein the concept names remain unchanged even if labels change and the creation identifier becomes obsolete and is removed.

The benefits outlined in the Request for option R2 of enhanced versioning and alignments with other relevant taxonomies (i.e. US GAAP and EDINET) are clear and compelling. By adopting option R2 (where element names are to remain unchanged even if labels change) elements can be revised across multiple reporting taxonomies. Leveraging existing elements is common, for example, in the Australian SBR taxonomy project. Under the existing approach, it is not just individual filers who would need to remap the IFRS taxonomy, but the governmental agencies using the IFRS Taxonomy (e.g. Australian SBR effort and similar groups) would need to rework all reporting taxonomies that leverage those renamed elements. Not only will filers have to remap those into their source systems, but also reporting agencies will need to remap those into their back end systems. We see the costs of renaming elements (which are theoretically invisible to the user and are primarily machine readable) as far outweighing the benefits.

It would be our expectation that, in most instances, any renaming of labels would be minor and incidental as major name changes to labels would indicate that the element has in fact changed in underlying meaning - a completely different concept. As a result, we would expect that a new element should be created to represent the new concept and the old element deprecated/removed from the reporting taxonomy supporting the decision to implement option R2.

We also recommend the IASB support efforts to move considerations of these efforts within XBRL International, such as the "Naming of Concepts RFC" developed by the XBRL International Taxonomy Architecture Working Group.

Q(b) Which of the options (D1, D2) should be implemented for the architecture of the IFRS Taxonomy with regards to the deletion of concepts? Please note that only one option may be selected. Please provide the reason for your decision as well your assessment of the benefits and costs of the selected option.

We believe that the preferred option is D2 Current US GAAP Approach wherein concepts are deprecated but remain in the schema, even if no longer required.

The benefits outlined in the Request for option D2 of enhanced versioning and alignment are supplemented by providing consumers with the information to create their own comparison between subsequent taxonomy versions. Further, our experience with taxonomies that included elements deleted within subsequent taxonomy versions allow for interrogation by available taxonomy management tools. Therefore, we question the cost presumption associated with option D2 outlined in the Request.

Option D2 is also the optimal solution where taxonomy extensions are being created or new reporting taxonomies are developed which leverage some of the reporting elements in the IFRS Taxonomy. By deleting elements from the taxonomy these extensions or additional reporting taxonomies would require additional work to remain useable. By deprecating, but allowing them to remain in the schema, the extensions or reporting taxonomies which leverage these elements would remain valid. There are valid instances where we would continue to use deprecated elements even though they are no longer being used under the IFRS taxonomy (i.e. they may remain valid for other legislative purposes). We acknowledge that the onus or responsibility for ensuring that the extensions or reporting taxonomies leveraging these elements is with the owner of these to ensure that the elements they are referencing are correct. We recognize that schemas could grow in size; technology may mature making this less relevant, or some minimum period of deprecation (for example, two years) may be considered to permit those who rely on those elements to "move" them into their own taxonomies and/or extensions.

Extending the Use of Dimensions in the IFRS Taxonomy

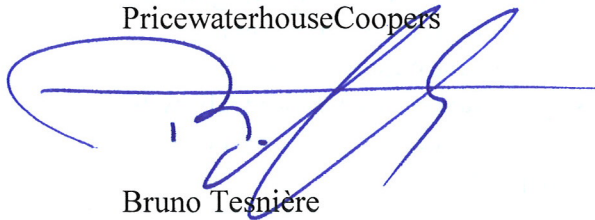
Q: Which of the listed options (L1a, L1b, L2) should be implemented for the architecture of the IFRS Taxonomy architecture concerning dimensions? Please note that more than one option may be selected. Please provide the reason for your decision as well your assessment of the benefits and costs of the selected option(s).

We believe that future IFRS Taxonomies will need to include options L1a, L1b, L2 and other dimensional aspects to harmonize with the use of dimensions within the US GAAP and EDINET Taxonomies. We recommend the IASB fully support the collaborative efforts within XBRL International, and in particular the Technology Architecture Working Group, to encourage broad discussion on which approaches will best bring the potential benefits of XBRL to light.

We would be happy to discuss our views further with you. If you have any questions regarding this letter, please contact Bruno Tesnière (+33 1 56 57 57 03), Jason Daniels (+61 (7) 3257 8536) or Eric Cohen (+ 1 585 271 4070).

Yours faithfully,

PricewaterhouseCoopers



Bruno Tesnière