



Mr. Olivier Servais
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Brussels, August 13th, 2009

Dear Olivier,

Please find our response on your request to the international community to evaluate the IASB's Request for Information on the "Concept naming and Change Management in the IFRS" and the "Extending the Use of Dimensions in the IFRS Taxonomy".

General comment

Dexia group is a group active in the banking and insurance sectors. The accounting teams prepare consolidated financial statements in IFRS for many entities of the group and for the group, and several entities of the group are subject to FINREP and COREP reporting under XBRL in different European countries.

In order to prepare the consolidated financial statements, Dexia, as all large groups, use consolidation software where the problem of maintenance of chart of accounts (equivalent to the concept naming and change management) and dimensions have been discussed and tested for many years. Even if the technology is different, the problems are the same, however in an environment where the users have less flexibility in the use and the interpretation of the solution proposed.

The main challenges to face are linked with the maintenance of the history of the concept naming, where a renaming or a deletion of a code makes the comparison between periods impossible, and the necessity to maintain a data model simple and manageable, by the use of several dimensions (15 dimensions). We are confident that this use of dimension will make the management of dimension easier, but we think that a strategic view on the content of dimension must be discussed and agreed before to create new dimensions. We recommend including the "flows" on accounts in a separate dimension that will create a huge decrease in the number of concepts.

In our response, we decided to retain the existing international solutions (EDINET or US gaap) in order to increase the comparability at worldwide level if different solutions seem

acceptable for us. This requires that the content of the concept is identical; otherwise, this will be more misleading than helpful.

Concept naming and Change Management in the IFRS

When reviewing the solution, we wonder if the creation identifier remain identical in the solution R1 or is changed: Minority interest Creation identifier was “i200806...” and become “I200806...” for Non-controlling interest, meaning that there is no history between those two concepts. This seems to be confirmed by the fact that § 13 does not include Creation identifier in element remaining consistent between taxonomies.

As IFRS texts are changing a lot and that several major changes are still expected (new IAS39 for example), ensuring a technical possibility of comparison between periods seems necessary for us.

The solution R2, which is also in line with international approach, seems for us a good approach but we have then to face the length of the names and the evolution of the terminology (if Non-controlling interest become in the future “Equity of third parties”, the previous reference in the texts with be Non-controlling interests and not Minority interest)

The R3 solution makes to difficult the analysis of files when searching information directly in the file, but can be managed by the use of corresponding tables in softwares. Note that many large consolidation software are using internal codes, not seen by users, that enable an easy technical data management.

Even if our short term preference is the R2, our decision is to promote the R3 solution that we see as the long term solution.

We are also in favour of the D2 solution, which is the US gaap approach, as it allows a comparison between periods, if the unused concepts may be stored or identified separately, so that the management of concepts can be done only on existing concepts, but a history can be searched on some concepts. If this separation between obsolete and actual can not be performed, the solution D1 must be retained.

Extending the Use of Dimensions in the IFRS Taxonomy

We are not a specialist of US gaap taxonomy, but we noted that solutions L1a (§ 11) and L1b (§16) seems to follow those two different approaches “ because the US gaap taxonomy follows a similar approach...”.

Our view is that a dimension must not be linked with a table but with a characteristic of information, like currency, country, counterparty category, rating, flows, etc and must remain independent from its presentation, otherwise, the exploitation of data’s will be more difficult. This solution seems for us also more flexible in the context of changes in IFRS and disclosures in a short future.

We are therefore in favour of solutions L1a and L1b, however, it seems for us that L1a offers more flexibility than solution L1b.

Regards,

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