

Response to RFI on Concept Naming – 11 August 2009

The following summarises the views of those members of XBRL Australia who have responded to us in this regard:

1. Renaming of concepts should be avoided as this increases the effort for software developers and users to retain mapping information from one version to the next. The versioning report is helpful in this regard but the better option is not to change them in the first place.
2. Option R2 is the preferred option as it retains some code readability for those who want it, without creating the problem of concept renaming under R1. Taxonomy authors need to be wary of creating unreadably long names under this option, thereby nullifying its benefit.
3. Option R3 should be considered where the temptation to “improve” concept names over time proves irresistible, or where it is too difficult to create concept names that all stakeholders can agree on.
4. Clause 13 – R1 Current IFRS Approach Benefits – contains 2 unsubstantiated claims that should be justified if they are to be used by the IASB. How does alignment between concept names, labels and concept id’s allow for meaningful automated quality assurance tests that would not be possible if they were not aligned? What sort of QA tests require such alignment?

Also, how does alignment of XML element names with IFRS terminology “at the code level” provide a benefit? To whom does this benefit accrue and to what extent? What is meant by “at the code level” as software programmers have had no need to date for using IFRS terminology when writing computer code.

5. Clause 15 – R2 Current US GAAP/EDINET Approach Benefits (and Clause 21): We cannot see how using this approach automatically aligns taxonomies that use it. Alignment comes from harmonization of the concept names themselves between taxonomies, not from the mere fact that the concept names do not change over time. In fact, it could be argued that this approach (not changing element names) could in fact perpetuate differences between taxonomies.
6. Clause 16 – R2 Costs – what is meant by the statement that the taxonomy will be “congested” with differences over time? Under this approach there will be one concept name/id and the same number of associated labels as would occur under any other approach. There would be no “congestion”, just labels that are different to concept names. What is the “cost” of having a label different to a concept name that you allude to here? Again you talk about “at the code level” – what do you mean here? Computer code will be written with the concept name only and completely ignore labels.
7. Of the 2 options presented, D2 is the preferred even though it requires some programming effort. For this to be effective, XBRL International would need to include the Deprecation Indicator into the Spec so that the device was globally accepted and understood.
8. One option not presented would be to move the deprecated elements from the main schema file into an extension, thus utilizing the namespace as the deprecation indicator. Whichever method is chosen it would need to be endorsed by XII as mentioned above.

Regards,

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