RR DONNELLEY

Global Capital Markets

The SEC Mandate for Interactive Data

Technology, Rules and Solutions

Agenda

- Background
  - XBRL Governing Body (XBRL US)
  - Regulatory Context (IDEA System)
  - XBRL Technology
- XBRL Mandate
  - Detailed Summary of Final Rules from the SEC
  - Phase in schedule
  - Difference from Proposed Rules
  - Liability Framework
  - Voluntary Filer implications
- Alternatives for Tagging Data
- RR Donnelley EZ Start Full-Service Solution
  - Advantages of Working with a Single Source Platform for EDGAR/XBRL
  - The RR Donnelley Difference

SEC Moves into the 21st Century

Interactive Data Electronic Applications (IDEA)

- On 8/19/08, SEC announced IDEA, the successor to EDGAR
- Stated goal: To give investors faster and easier access to key financial information about public companies and mutual funds
- Marks shift from submission of documents to submission of data
- Consistent with Interactive Data Initiative and previously announced $50M investment in EDGAR replacement
- Gradual phase-in of five years

> "By tapping the power of interactive data to tear down barriers to quick and meaningful investment information, markets can become fairer and more efficient while investors can possess far better quality data than was ever possible before."
>
> - David Blaszkowsky, Director of the SEC's Office of Interactive Disclosure

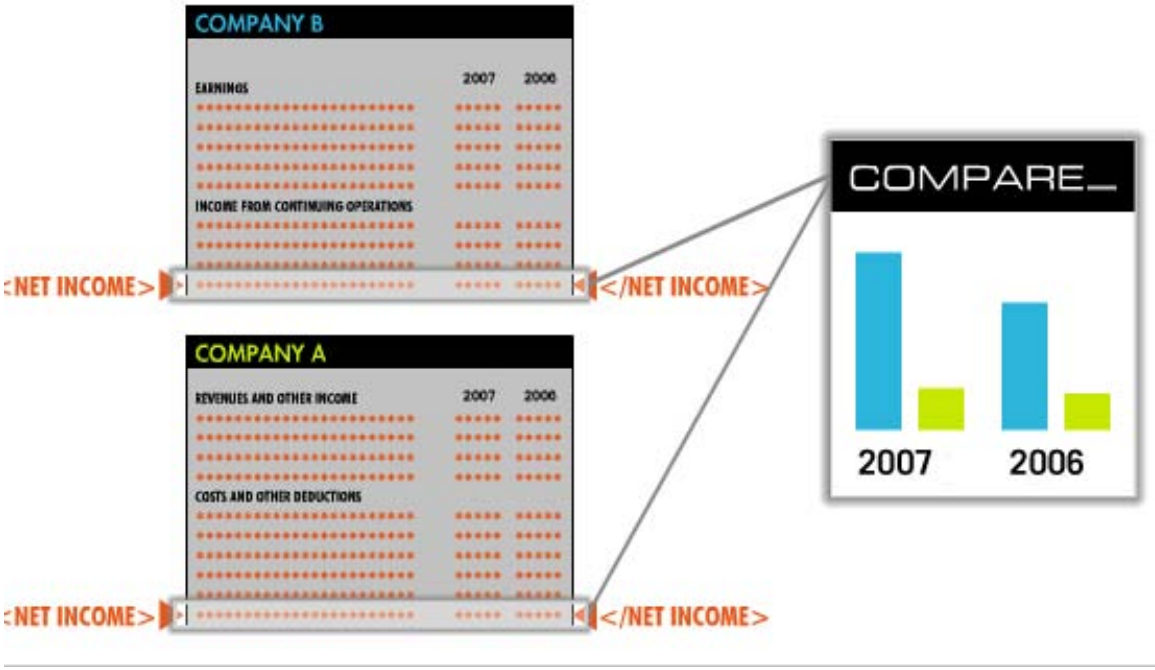
XBRL US

- National consortium for XML business reporting standards
- Members include accounting firms, software providers, newswires, filing agents and information intermediaries
- Mission
  - Facilitate the development and use of taxonomies for public and private sector applications
  - Promote adoption of XBRL through the collaboration of all business reporting supply chain participants
- Responsible for
  - Creating awareness and educating the reporting community on XBRL
  - Build-out and maintenance of the taxonomies
    - New taxonomy release scheduled for February 2009

What Is XBRL?

What is XBRL?

- eXtensible Business Reporting Language (Interactive Data)
- International Supply chain standardization effort
- Each line item is given data tag standardized by US GAAP and different industries



What does it do?

- Creates machine-processed disclosures for more effective communication, easy re-use and analysis

Key XBRL Terms to Know

Tag

- Machine-readable “barcode” that gives a standardized definition for each disclosure item in an income statement, SCF, or balance sheet, notes or MD&A

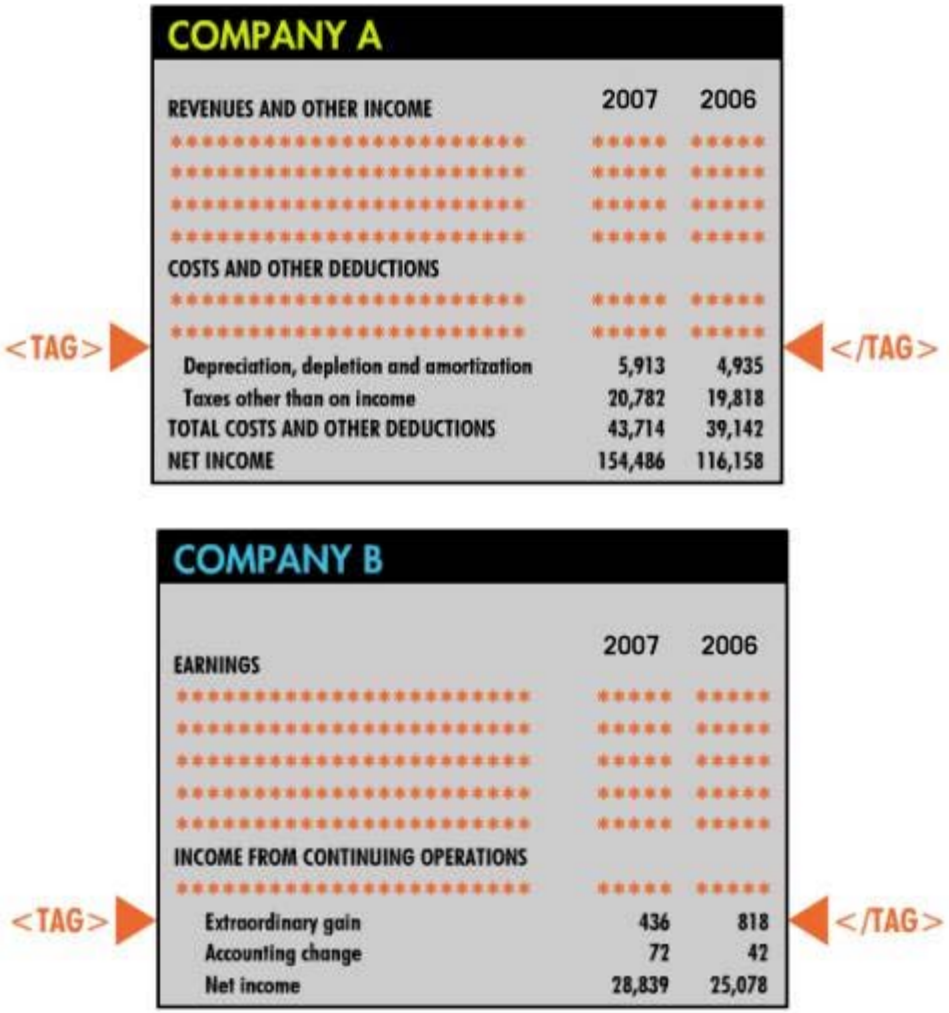
Taxonomy

A “dictionary” of tags for:

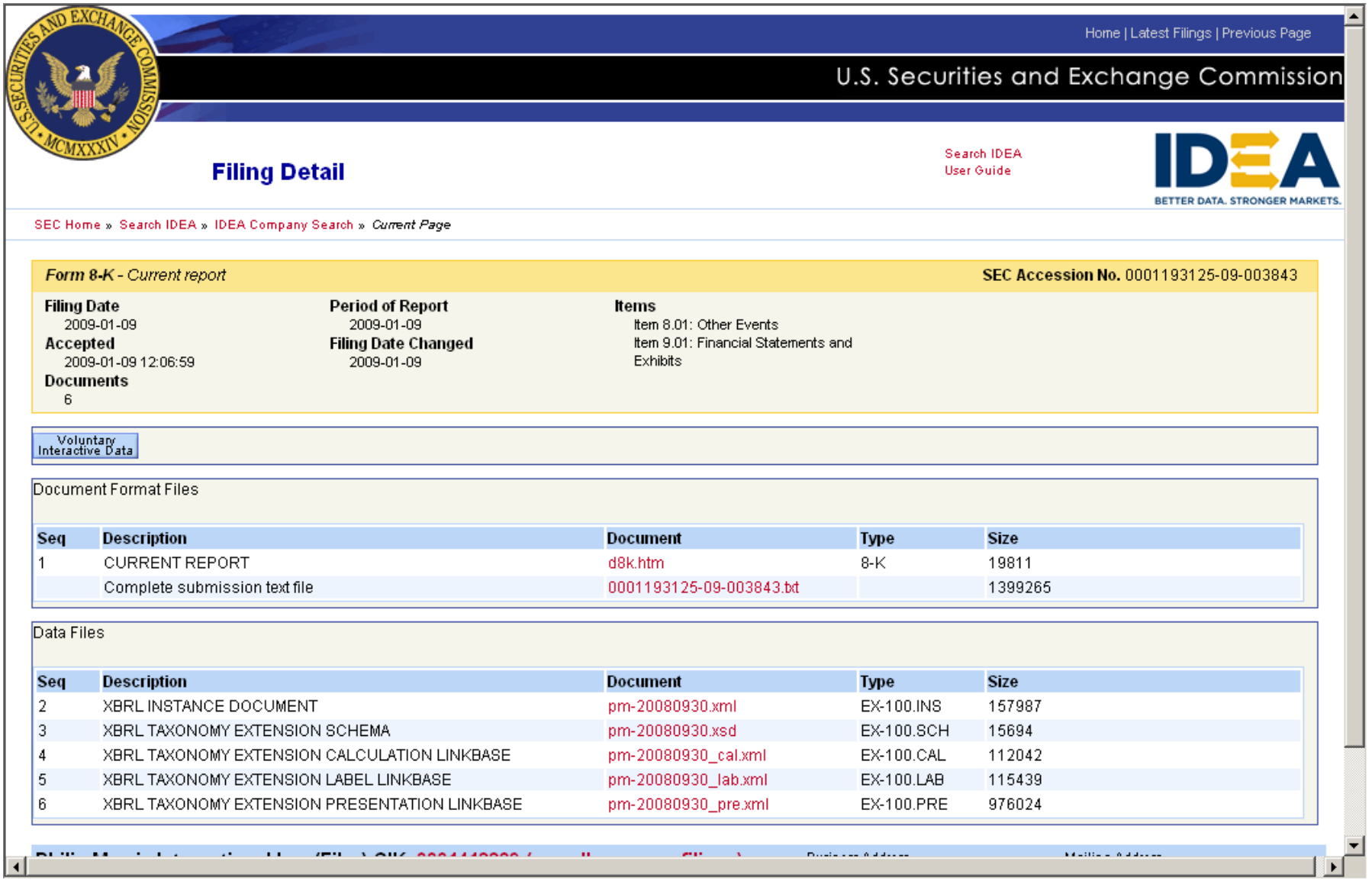
- Specific accounting standards (US GAAP, IFRS)
- Industry segments (e.g., energy, REIT’s, Broker-Dealers, Commercial)
- Company-specific disclosures

Instance document

- XBRL structured document of company disclosures that is the building block to viewing and



Key XBRL Terms to Know



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U.S. Securities and Exchange Commission

Filing Detail

Search IDEA
User Guide

IDEA
BETTER DATA. STRONGER MARKETS.

SEC Home » Search IDEA » IDEA Company Search » *Current Page*

Form 8-K *- Current report* **SEC Accession No.** 0001193125-09-003843

Filing Date
2009-01-09
Accepted
2009-01-09 12:06:59
Documents
6

Period of Report
2009-01-09
Filing Date Changed
2009-01-09

Items
Item 8.01: Other Events
Item 9.01: Financial Statements and Exhibits

Voluntary Interactive Data

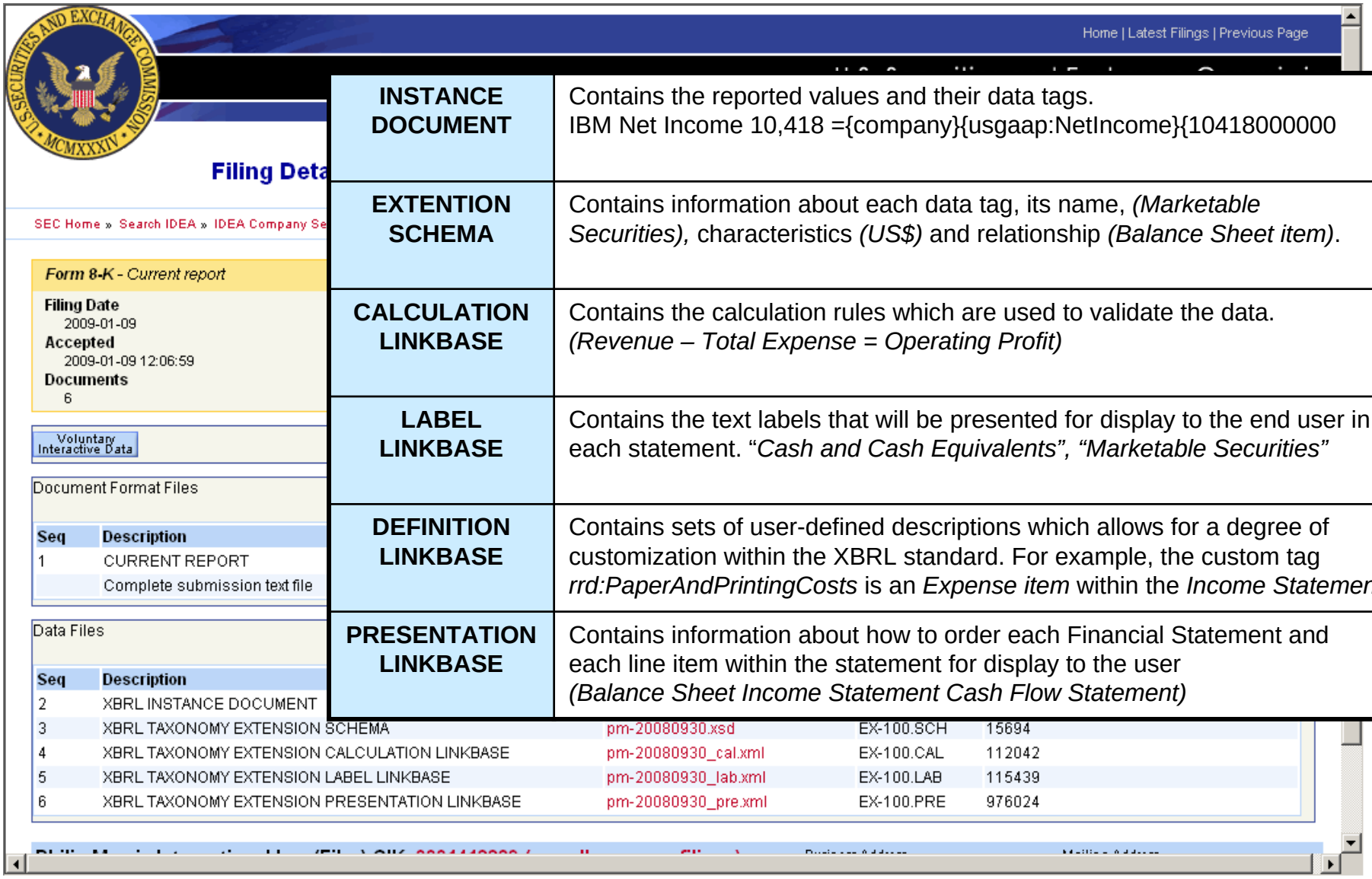
Document Format Files

Seq	Description	Document	Type	Size
1	CURRENT REPORT	d8k.htm	8-K	19811
	Complete submission text file	0001193125-09-003843.txt		1399265

Data Files

Seq	Description	Document	Type	Size
2	XBRL INSTANCE DOCUMENT	pm-20080930.xml	EX-100.INS	157987
3	XBRL TAXONOMY EXTENSION SCHEMA	pm-20080930.xsd	EX-100.SCH	15694
4	XBRL TAXONOMY EXTENSION CALCULATION LINKBASE	pm-20080930_cal.xml	EX-100.CAL	112042
5	XBRL TAXONOMY EXTENSION LABEL LINKBASE	pm-20080930_lab.xml	EX-100.LAB	115439
6	XBRL TAXONOMY EXTENSION PRESENTATION LINKBASE	pm-20080930_pre.xml	EX-100.PRE	976024

Key XBRL Terms to Know



INSTANCE DOCUMENT	Contains the reported values and their data tags. IBM Net Income 10,418 ={company}{usgaap:NetIncome}{10418000000
EXTENTION SCHEMA	Contains information about each data tag, its name, *(Marketable Securities),* characteristics *(US$)* and relationship *(Balance Sheet item)*.
CALCULATION LINKBASE	Contains the calculation rules which are used to validate the data. *(Revenue – Total Expense = Operating Profit)*
LABEL LINKBASE	Contains the text labels that will be presented for display to the end user in each statement. "*Cash and Cash Equivalents", "Marketable Securities"*
DEFINITION LINKBASE	Contains sets of user-defined descriptions which allows for a degree of customization within the XBRL standard. For example, the custom tag *rrd:PaperAndPrintingCosts* is an *Expense item* within the *Income Statement*
PRESENTATION LINKBASE	Contains information about how to order each Financial Statement and each line item within the statement for display to the user *(Balance Sheet Income Statement Cash Flow Statement)*

Key XBRL Terms to Know

Dimensions

Common Stock Amount		us-gaap:CommonStockMember
Beginning Balance	$13,000,000	us-gaap:StockholdersEquity
Issuances of Common Stock		us-gaap:StockIssuedDuringPeriodVa
Common Stock	-$1,000,000	us-gaap:StockRepurchasedDuringPe
Ending Balance	$12,000,000	us-gaap:StockholdersEquity
Retained Earnings		us-gaap:RetainedEarningsMember
Beginning Balance	$18,929,000,000	us-gaap:StockholdersEquity
Net Earnings	$2,977,000,000	us-gaap:NetIncomeLoss
Common Stock	-$1,087,000,000	us-gaap:StockRepurchasedDuringPe
Adjustment to Adopt FIN 48		us-gaap:CumulativeEffectOfInitialAd
Common Stock Dividend	-$37,000,000	us-gaap:CashDividends
Ending Balance	$20,782,000,000	us-gaap:StockholdersEquity
Accumulated Other		us-gaap:AccumulatedOtherMember
Beginning Balance	$98,000,000	us-gaap:StockholdersEquity

Dimensions allow the reuse of an XBRL tag so it can be applied to multiple line items.

In the Shareholder's Equity Table the Beginning and Ending Balance items are shared by: *Common Stock*, *Retained Earnings* and *Accumulated Other* sections.

The same tag is applied to values in these sections.

Dimensions differentiate between each occurrence when the same tag is reused.

XBRL Tag	*Dimension*
us-gaap:StockholdersEquity	*[CommonStockMember]*
us-gaap:StockholdersEquity	*[RetainedEarningsMember]*
us-gaap:StockholdersEquity	*[AccumulatedOtherMember]*

Key XBRL Terms to Know

Parentheticals

SHAREHOLDERS' EQUITY		
Preferred stock, $1.00 par value	—	—
Authorized: 2.0 shares; Issued: None		
Common stock, $1.25 par value	303.7	303.7
Authorized: 500.0 shares; Issued: 243.0 shares in 2006 and 2005		
Additional paid-in-capital	2,871.8	2,888.2
Retained earnings	1,615.0	1,439.4
Accumulated other comprehensive income (loss)	62.1	(90.2)
Unearned compensation	—	(44.9)
Treasury stock, at cost, 24.2 shares in 2006 (25.5 shares—2005)	(727.9)	(772.0)
Total shareholders' equity	4,124.7	3,724.2
Total liabilities and shareholders' equity	$ 9,635.8	$ 9,373.7

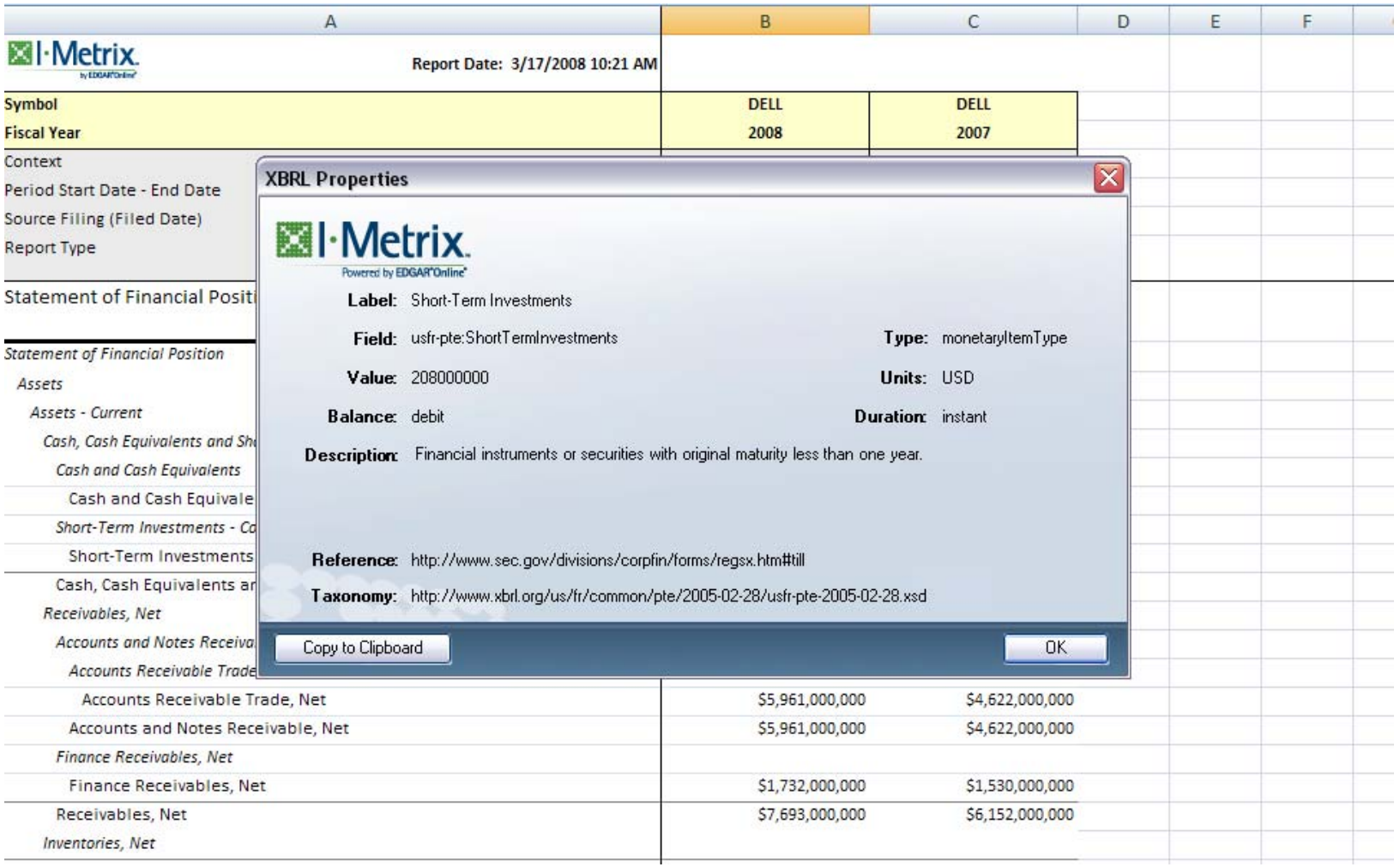
Shareowners' (Deficit) Equity:			us-gaap:StockholdersEquityAbstract
Common stock	$495,000,000	$494,000,000	us-gaap:CommonStockValue
Par value	$1	$1	us-gaap:CommonStockParOrStatedValueP
Authorized	1,000,000,000	1,000,000,000	us-gaap:CommonStockSharesAuthorized
Issued	495,117,935	494,079,344	us-gaap:CommonStockSharesIssued
Additional paid-in capital	$3,277,000,000	$3,215,000,000	us-gaap:AdditionalPaidInCapital
(Accumulated deficit) reinvested earnings	-$3,029,000,000	$1,527,000,000	us-gaap:RetainedEarningsAccumulatedDe
Accumulated other comprehensive (loss)	-$666,000,000	$557,000,000	us-gaap:AccumulatedOtherComprehensiv
Common stock in treasury, at cost	-$108,000,000	-$104,000,000	us-gaap:TreasuryStockValue
Shares	7,320,447	7,125,872	us-gaap:TreasuryStockShares
Total shareowners' (deficit) equity	-$31,000,000	$5,689,000,000	us-gaap:StockholdersEquity
Total liabilities and shareowners' (deficit)	$15,589,000,000	$24,099,000,000	us-gaap:LiabilitiesAndStockholdersEquity

Parenthetical data appears when multiple data values exist within a single line item

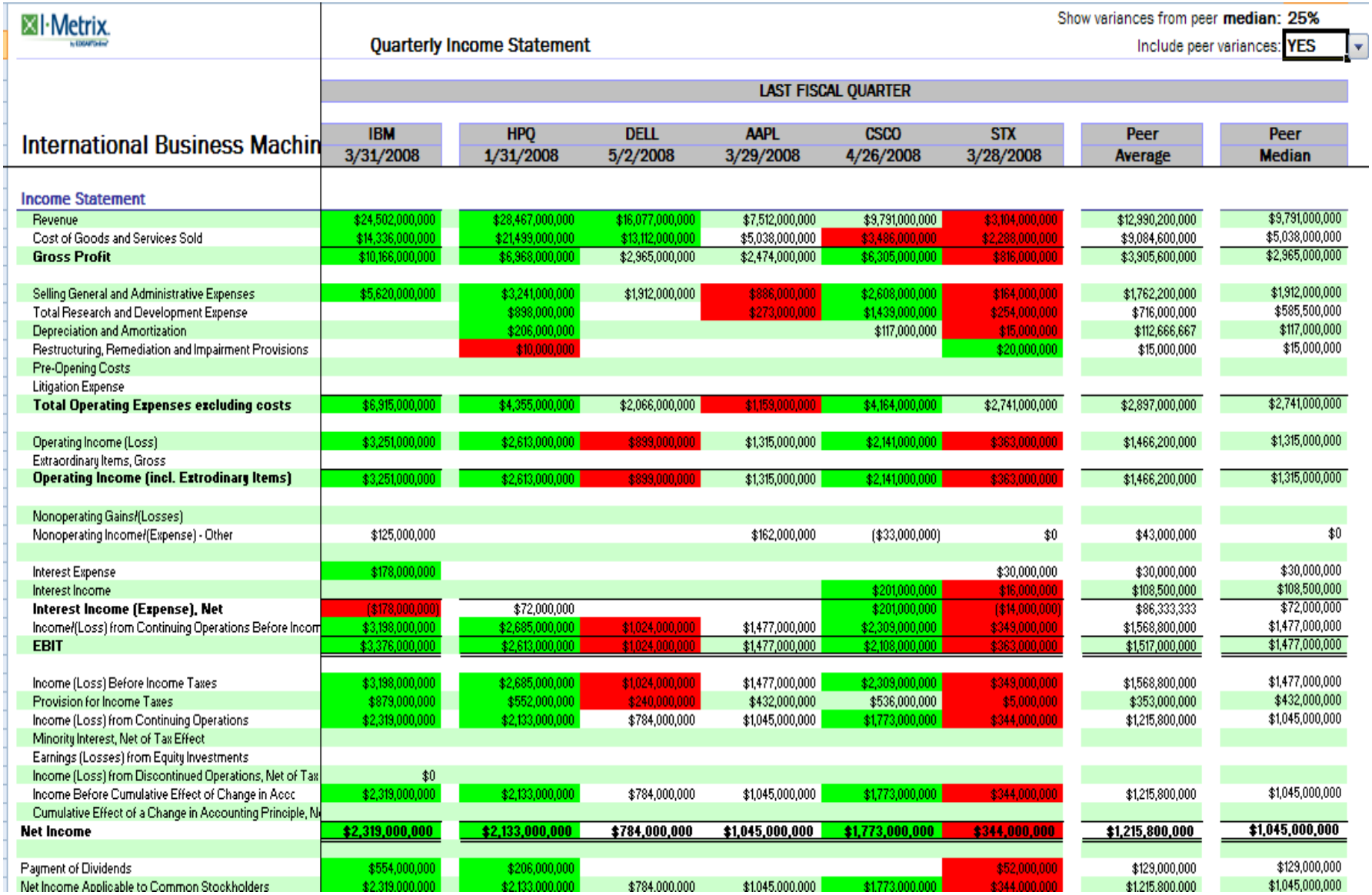
XBRL requires that each data point in the single line be separately tagged.

This example illustrates: Common Stock, Par Value, Shares Authorized and Shares Issued.

XBRL in Action



XBRL in Action



I-Metrix

Quarterly Income Statement

Show variances from peer **median: 25%**

Include peer variances: YES

International Business Machin	LAST FISCAL QUARTER							
	IBM 3/31/2008	HPQ 1/31/2008	DELL 5/2/2008	AAPL 3/29/2008	CSCO 4/26/2008	STX 3/28/2008	Peer Average	Peer Median
Income Statement								
Revenue	$24,502,000,000	$28,467,000,000	$16,077,000,000	$7,512,000,000	$9,791,000,000	$3,104,000,000	$12,990,200,000	$9,791,000,000
Cost of Goods and Services Sold	$14,336,000,000	$21,499,000,000	$13,112,000,000	$5,038,000,000	$3,486,000,000	$2,288,000,000	$9,084,600,000	$5,038,000,000
Gross Profit	$10,166,000,000	$6,968,000,000	$2,965,000,000	$2,474,000,000	$6,305,000,000	$816,000,000	$3,905,600,000	$2,965,000,000
Selling General and Administrative Expenses	$5,620,000,000	$3,241,000,000	$1,912,000,000	$886,000,000	$2,608,000,000	$164,000,000	$1,762,200,000	$1,912,000,000
Total Research and Development Expense		$898,000,000		$273,000,000	$1,439,000,000	$254,000,000	$716,000,000	$585,500,000
Depreciation and Amortization		$206,000,000			$117,000,000	$15,000,000	$112,666,667	$117,000,000
Restructuring, Remediation and Impairment Provisions		$10,000,000				$20,000,000	$15,000,000	$15,000,000
Pre-Opening Costs								
Litigation Expense								
Total Operating Expenses excluding costs	$6,915,000,000	$4,355,000,000	$2,066,000,000	$1,159,000,000	$4,164,000,000	$2,741,000,000	$2,897,000,000	$2,741,000,000
Operating Income (Loss)	$3,251,000,000	$2,613,000,000	$899,000,000	$1,315,000,000	$2,141,000,000	$363,000,000	$1,466,200,000	$1,315,000,000
Extraordinary Items, Gross								
Operating Income (incl. Extrodinary Items)	$3,251,000,000	$2,613,000,000	$899,000,000	$1,315,000,000	$2,141,000,000	$363,000,000	$1,466,200,000	$1,315,000,000
Nonoperating Gains/(Losses)								
Nonoperating Income/(Expense) - Other	$125,000,000			$162,000,000	($33,000,000)	$0	$43,000,000	$0
Interest Expense	$178,000,000					$30,000,000	$30,000,000	$30,000,000
Interest Income					$201,000,000	$16,000,000	$108,500,000	$108,500,000
Interest Income (Expense), Net	($178,000,000)	$72,000,000			$201,000,000	($14,000,000)	$86,333,333	$72,000,000
Income/(Loss) from Continuing Operations Before Incom	$3,198,000,000	$2,685,000,000	$1,024,000,000	$1,477,000,000	$2,309,000,000	$349,000,000	$1,568,800,000	$1,477,000,000
EBIT	$3,376,000,000	$2,613,000,000	$1,024,000,000	$1,477,000,000	$2,108,000,000	$363,000,000	$1,517,000,000	$1,477,000,000
Income (Loss) Before Income Taxes	$3,198,000,000	$2,685,000,000	$1,024,000,000	$1,477,000,000	$2,309,000,000	$349,000,000	$1,568,800,000	$1,477,000,000
Provision for Income Taxes	$879,000,000	$552,000,000	$240,000,000	$432,000,000	$536,000,000	$5,000,000	$353,000,000	$432,000,000
Income (Loss) from Continuing Operations	$2,319,000,000	$2,133,000,000	$784,000,000	$1,045,000,000	$1,773,000,000	$344,000,000	$1,215,800,000	$1,045,000,000
Minority Interest, Net of Tax Effect								
Earnings (Losses) from Equity Investments								
Income (Loss) from Discontinued Operations, Net of Tax	$0							
Income Before Cumulative Effect of Change in Accc	$2,319,000,000	$2,133,000,000	$784,000,000	$1,045,000,000	$1,773,000,000	$344,000,000	$1,215,800,000	$1,045,000,000
Cumulative Effect of a Change in Accounting Principle, N								
Net Income	**$2,319,000,000**	**$2,133,000,000**	**$784,000,000**	**$1,045,000,000**	**$1,773,000,000**	**$344,000,000**	**$1,215,800,000**	**$1,045,000,000**
Payment of Dividends	$554,000,000	$206,000,000				$52,000,000	$129,000,000	$129,000,000
Net Income Applicable to Common Stockholders	$2,319,000,000	$2,133,000,000	$784,000,000	$1,045,000,000	$1,773,000,000	$344,000,000	$1,215,800,000	$1,045,000,000

SEC Final Rules Released – January 30th, 2009

XBRL Mandate Phase-in Schedule and Impacted Groups

Phase in over three years, starting with periods ending after 6/15/09

Year One

- Domestic and foreign LAFS using US GAAP
- Public float >$5B (as of end of Q2 of most recently completed FY
- ~500 companies

Year Two

- All other domestic and foreign LAFs using US GAAP
- ~ 1500 companies

Year Three

- All remaining filers using US GAAP
- All foreign issuers that prepare in IFRS
- ~ 8500 companies

For this rule, Investment Management Companies are not impacted.

SEC Final Rules Released – January 30th, 2009

XBRL Mandate: Changes from Proposed to Final Rule

Proposed Rule		Final Rule
Effective date December 15, 2008	**Changed to**	**Effective date June 15, 2009**
Beginning with 1st periodic report after effective date, 10Q, 10K or 20F		**Beginning with 1st periodic report after effective date, 10Q, 20F or 40F**
Did not include 6K, 8K or 40F filings		**Includes 6K/8K with revised financials & 40F for periodic report**

SEC Final Rules Released – January 30th, 2009

What Needs to be Tagged in XBRL?

Periodic Reports

Form Types

- Form 10-Q, 10-K
- Form 20-F and
- MJDS Forms F-9, F-10, 40-F (only for companies using US GAAP)
- Forms 8-K and 6-k containing revised financial statements
- Supplements HTML and ASCII; does not replace it

→

Financial Statements

- Balance sheet
- Income statement
- Statement of comprehensive income
- Statement of Cash Flows
- Statement of Owner's Equity

→

Footnotes

- Financial statement footnotes and schedules
- Block text only in year one
- Detailed tagging after year one
- Optional tagging of Narrative information

SEC Final Rules Released – January 30th, 2009

Footnotes and Schedules

Footnotes & Schedules Tagging Requirements

	Year 1 (Block Tagging)	Year 2 (Detailed Tagging)
Footnotes	• Each complete footnote tagged as a single block of text	• Each complete footnote tagged as a single block of text • Each significant accounting policy within the significant accounting policies footnote tagged as a single block of text • Each table within each footnote tagged as a separate block of text; and • Within each footnote, each amount (i.e. monetary value, percentage, and number) separately tagged • Narrative disclosure is OPTIONALLY tagged data by using US GAAP or IFRS Taxonomies.
Schedules	• Each complete financial statement schedule tagged as a block of text	• Each amount (i.e. monetary value, percentage, and number) separately tagged and

Footnote Tagging: Detailed – 2nd Year requirement

Companies would insert a table below the narrative with the individual facts which would allow for more precise tagging of the detailed information in a structured format. Therefore, each item in the table below would be tagged separately.

ORIGINAL FOOTNOTE

Stock Options

The Company granted 754,000 and 470,000 stock options in the years ended December 31, 2008 and 2007, respectively. No stock options were granted in 2006. The fair value of each stock option award is estimated on the date of grant using the Black Scholes option pricing model. The fair value of the stock options was determined using the following assumptions:

	2008		2007	
Expected volatility	22.78	%	20.34	%
Risk-free interest rate	2.96	%	4.52	%
Expected life (years)	6.25		7	
Expected dividend yield	3.31	%	2.85	%

The grant date fair value of options granted was $5.63 and $7.84 for the years ended December 31, 2008 and 2007, respectively.

Footnote Tagging: Detailed – 2nd Year requirement

Companies would insert a table below the narrative with the individual facts which would allow for more precise tagging of the detailed information in a structured format. Therefore, each item in the table below would be tagged separately.

DETAIL TAGGED FOOTNOTE

Stock Options

The Company granted 754,000 and 470,000 stock options in the years ended December 31, 2008 and 2007, respectively. No stock options were granted in 2006. The fair value of each stock option award is estimated on the date of grant using the Black Scholes option pricing model. The fair value of the stock options was determined using the following assumptions:

Grant-Date	12/31/2008		12/31/2007	tag-GrantDate
Stock Options Granted	754,000		470,000	tag-StockOptions
Expected Volatility	22.78%		20.34%	tag-ExpectedVolitility
Risk-Free Interest Rate	2.96%		4.52%	tag-RiskFreeInterestRate
Expected life (years)	6.25		7.00	tag-ExpectedLife
Expected dividend yield	3.31%		2.85%	tag-ExpectedDividendYield
Fair value on grant date	$5.63		$7.84	tag-FairValueOnGrantDate

The grant date fair value of options granted was $5.63 and $7.84 for the years ended December 31, 2008 and 2007, respectively.

SEC Final Rules Released – January 30th, 2009

What needs to be Tagged in XBRL?

Registration Statements

Form Types

- Form S-1, S-3, S-4
- Forms S-11, F-1, F-3, F-4
- Includes registration statements for annuity contracts filed on Forms S-1 and S-3

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Timing

- Excluding IPOs, all registration statements have to include interactive data after a price range has been determined, or any time after when financials are changed

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Exceptions

- Not required in a statement that merely incorporates financial statements by reference
- Does not include IPO's or registration statements under the exchange act

For business combinations, only the Acquiring Company must provide interactive data

SEC Final Rules Released – January 30th, 2009

Filings that do Not Contain XBRL Filing Requirement

MJDS Filings (F-9, F-10)

- Filed by Canadian issuers using Canadian GAAP or reconciled US-GAAP

Final Prospectuses

- Filed pursuant to Rule 424(b) under the Securities Act

Acquired Companies

- Financial statements of a company proposed to be acquired that are included in a Form S-4 or F-4

Financial Statements other than the Issuer's Financial Statements

- Financial statements of a company proposed to be acquired that are included in a Form S-4 or F-4
- Financial statements of businesses acquired or to be acquired
- Financial statements of unconsolidated subsidiaries and 50% or less owned persons
- Financial statements of guarantors
- NOT Required for financial statements pursuant to Rules 3-05, 3-09, 3-14 and 3-16 of Reg S-X
- Additionally pro forma financial statements prepared under Article 11 of Reg S-X are not subject to interactive data requirements

SEC Final Rules Released – January 30th, 2009

XBRL Submission Timing

Deadlines

- Due on the same day as the traditional HTML or ASCII filing
  - Interactive data files as an exhibit to the traditional filing
  - Must be submitted to EDGAR and posted to the company website

Exception 1

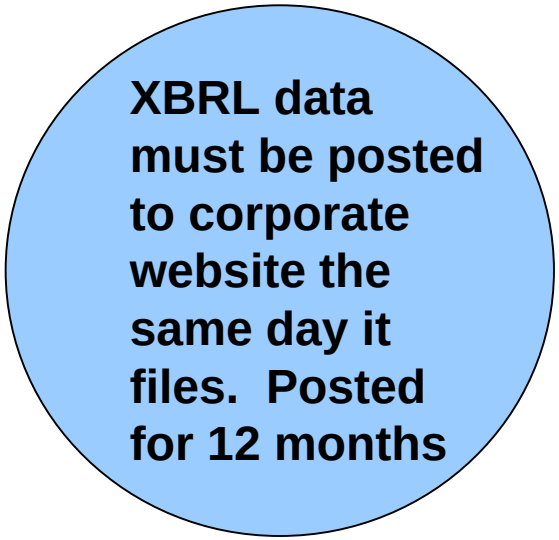
- 30 day grace period permitted for first XBRL submission

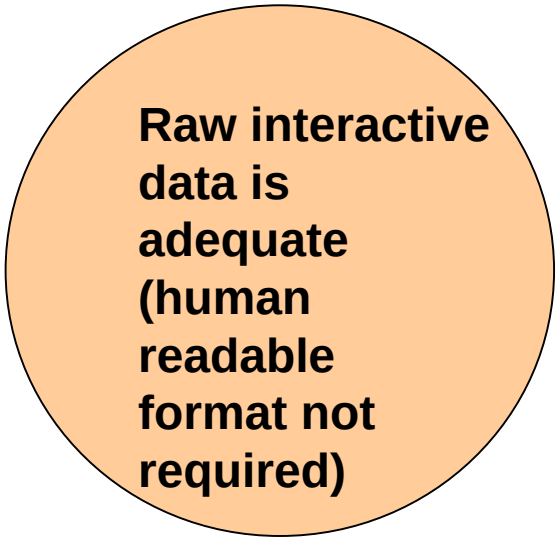
Exception 2

- 30 day grace period permitted for first XBRL submission with detailed footnote tagging

SEC Final Rules Released – January 30th, 2009

Web Hosting Requirement





SEC Proposed Rules Released – January 30, 2009

Liability Framework

First 24 Months – Furnished	After the 24th Month – Filed
• Similar to VFP liability • Deemed not filed for purposes of specified liability provisions • Protected from liability for failure to comply with the tagging requirements if – Interactive data file failed to meet requirements but failure occurred despite filers good faith effort and – Filer corrected failure promptly after becoming aware of it • Machine readable file only	• Subject to the same liability under the federal securities laws as the corresponding portions of official HTML or ASCII filing – Subject to liability under Sections 11 and 12 of the Securities Act – Section 18 of the Exchange Act and Section 34(b) of the Investment Company Act • Machine readable file only

SEC Final Rules Released – January 30th, 2009

Liability Framework (continued)

Officer Certifications and Integration of Interactive Data & Business Information Processing

Officer Certification

- Interactive Data is excluded from the officer certification requirements in Rules 13a-14 and 15d-14

Integration into Business Information Processing

- Integration could have implications on internal controls

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- Integration could have implications on internal controls no different than any other controls related to preparing financial statements

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- XBRL preparation may become interdependent; issuer and auditors should evaluate changes in context of their reporting on internal control over financial reporting

SEC Final Rules Released – January 30th, 2009

Liability Framework (continued)

Auditor Liability on Interactive Data Files

Allowed, but not required.

There is no additional basis for auditor liability based on data tagging; however…

Rules do not prohibit issuers from indicating the degree of auditor involvement in the tagging process (such as in a footnote)

Issuers may voluntarily obtain third party assurance on XBRL data under PCAOB Interim Attestation Standard

SEC Final Rules Released – January 30th, 2009

Liability Framework (continued)

Major and Minor Errors

Major Error

- Similar to VFP
- Major error will cause exhibit to be suspended
- Rest of traditional filing will be accepted/ disseminated if no errors other than XBRL

↓

Filer must revise XBRL exhibit and submit as an amendment to filing

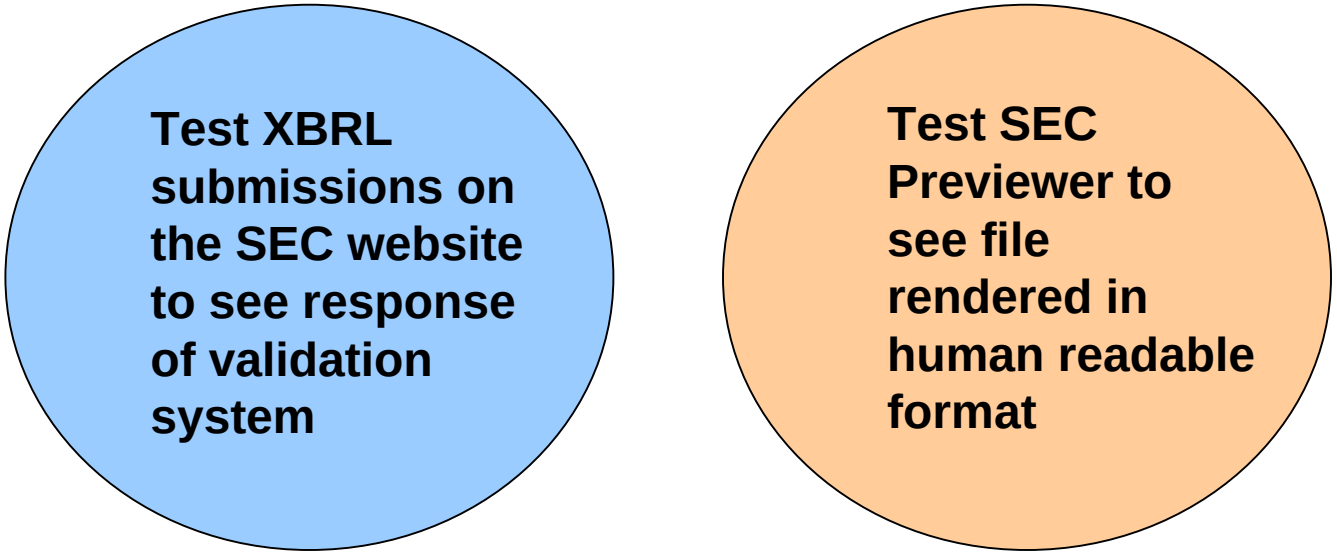
Minor Error

- Will not prevent the exhibit from being accepted
- XBRL will be disseminated with the traditional filing

SEC Final Rules Released – January 30th, 2009

Liability Framework (continued)

Avoiding Errors – Make a Test Submission



SEC Final Rules Released – January 30, 2009

Non-Compliance & 'Springback' of Current Status

Non-Compliance

- Filers who do not provide/post XBRL on date required deemed not current

Implications

- Not eligible to use short forms: S-3, F-3, S-8 or elect under Form S-4 or F-4 to provide information at a level prescribed by Form S-3 or F-3
- Not deemed to have available adequate current public information for resale exemption safe harbor provided under Rule 144.

Springback of Current Status

- Filer deemed not current solely as a result of not providing an interactive data exhibit would be deemed current and timely upon providing the interactive data
- Would regain short form eligibility and Rule 144 safe harbor

SEC Final Rules Released – January 30, 2009

Revised/Amended/Restated financials and XBRL

- If filer revises its previously filed financial statements,
- Then filer must also provide revised interactive data

Clarification

- If filing is revised but financial statements are unchanged, no interactive data update required

SEC Final Rules Released – January 30, 2009

Hardship Exemptions

Rule 201	When It Applies	Implications
• Provides temporary hardship exemption when filer has technical difficulties that delay a filing	• Exemption applies without staff or Commission action if filer experiences unanticipated technical difficulties	• When applied, filer is deemed current for a period of up to six business days from the original interactive data deadline

Issuer would apply for hardship through the standard process outlined in the EDGAR manual

SEC Final Rules Released – January 30, 2009

Implications for Voluntary Filers

Can issuers continue to file voluntarily?

- Yes, issuers can file interactive data before they are mandated by the phase-in schedule

Can voluntary filers start and stop?

- Yes

Implications

What is the implication for the first filing 30 day grace period?

- The 30 day grace period is applied against the filer's first XBRL filing after 6/15/09, whether mandatory or voluntary

What is the implication for the first detailed notes 30 day grace period?

- The 30 day grace period for the first filing with detailed footnotes is applied against the filer's first such filing after 6/15/09, whether mandatory or voluntary

What are the liability implications?

- Liability is tied to the issuer's mandate date
- The 24 months of "Furnished, Not Filed" status is not impacted by voluntary filings

Alternatives for Tagging Your Data in XBRL

Scenario 1

Self Tagging – DIY Approach

- Purchase XBRL tagging software
- Output your financial statements
- Train staff on XBRL mapping
- Select or extend taxonomy, then map each line item to the correct XBRL element
- Apply validation and business rules
- Produce documents for SEC submission

Full Service Solution

- Select full service provider
- Provide financial statements
- Create company specific extensions
- Review and verify XBRL tags
- Sign off for submission of documents to SEC

Scenario 2

Embedded Solution

- Identify appropriate XBRL software
- Assess implementation plan, process enhancements and resource requirements
- Implement software and process changes
- Incorporate validation and business rules
- Export data XBRL submission documents

Full Service Solution – RR Donnelley EZ Start XBRL

How is RR Donnelley's Full-Service EZ Start XBRL Solution Different?

Experience & Expertise

- RR Donnelley is the #1 XBRL filer
- Deep knowledge of the rules governing taxonomies and extension process
- CPA-trained taxonomy experts with 2+ years of tagging experience with XBRL voluntary filers

Time Savings

- XBRL Proofs available in 1-3 days
- Taxonomy experts complete the initial tagging, saving 80-100 hours
- XBRL specialists transfer knowledge to ensure understanding of the taxonomies, mapping process and SEC requirements
- No need to purchase, install and learn software

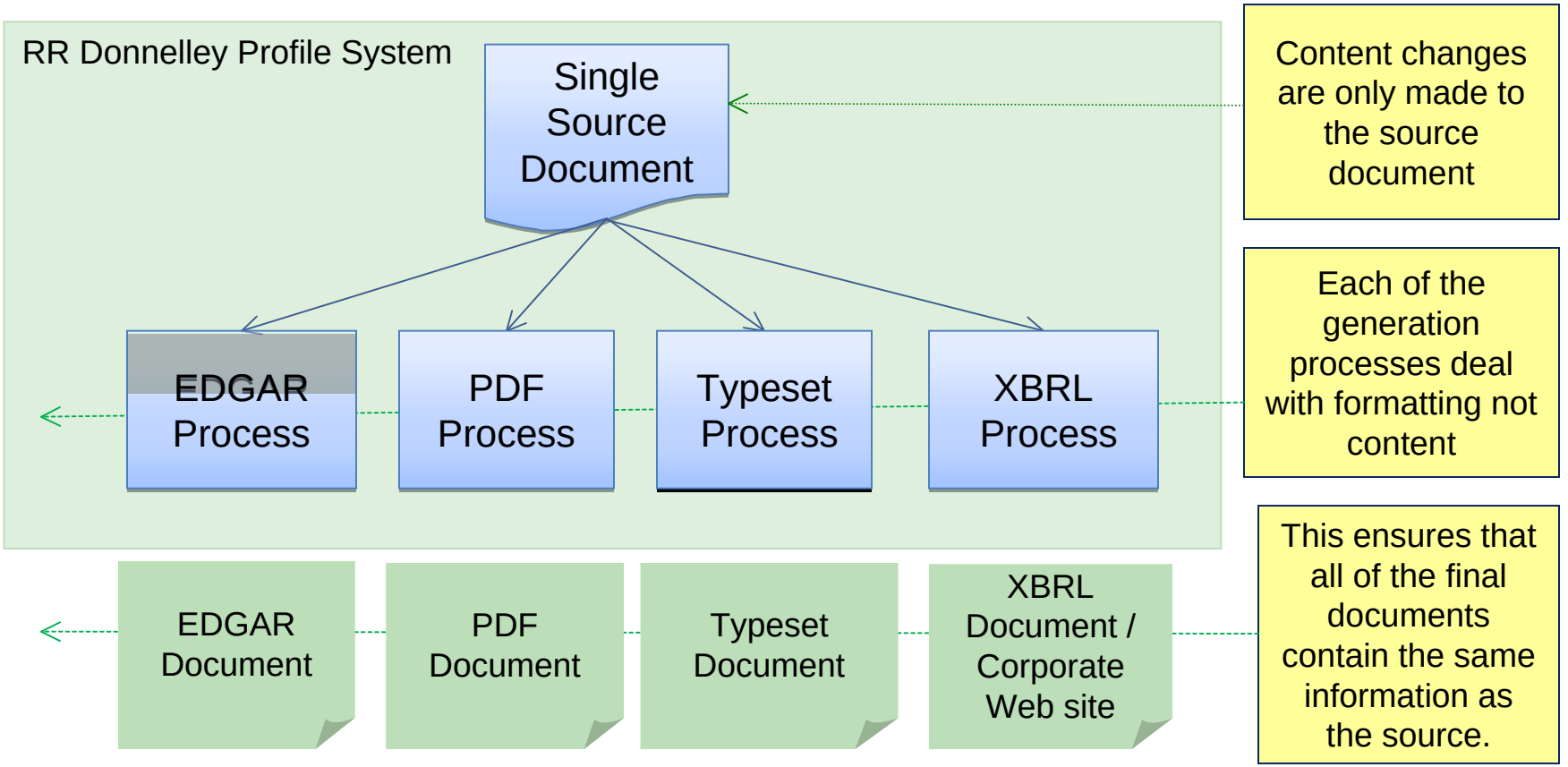
Cost Effective

- Timely high quality offering
- No purchase of software required, all you need is Excel
- Low cost, full-service solution
- Cost of EZ Start solution is over 70% less than the SEC estimate

Full Service Solution – RR Donnelley EZ Start XBRL (cont'd)

Data Quality

- Translations begin with the I-Metrix database, a proprietary set of XBRL-tagged financials for 12,000 public companies going back to 1998
- The business rules ensure collective experience is built into our translations



Alternatives for Tagging Your Data in XBRL

Full Service Solution – RR Donnelley EZ Start XBRL

How is RR Donnelley's Full-Service EZ Start XBRL Solution Different?

Simplicity - Simply call RR Donnelley and receive an XBRL proof

1. Request XBRL Translation
   - Call RR Donnelley
   - You receive an XBRL proof in Excel format
   - Review preliminary account mapping
2. Review XBRL Files
   - After reviewing mapping, submit list of questions and edits
   - Our taxonomy experts answer any questions, make changes, perform quality review and return edited document
3. Transmit to SEC
   - Your team performs the final review and approves the XBRL files.
   - RR Donnelley validates the HTML and XBRL files, performs EDGAR test filing and transmits your XBRL filing to the SEC

How to Get Started – EZ Start XBRL Solution

Reviewers guide map tags and definitions

As Filed Income Statement

Ask questions or submit edits on line items

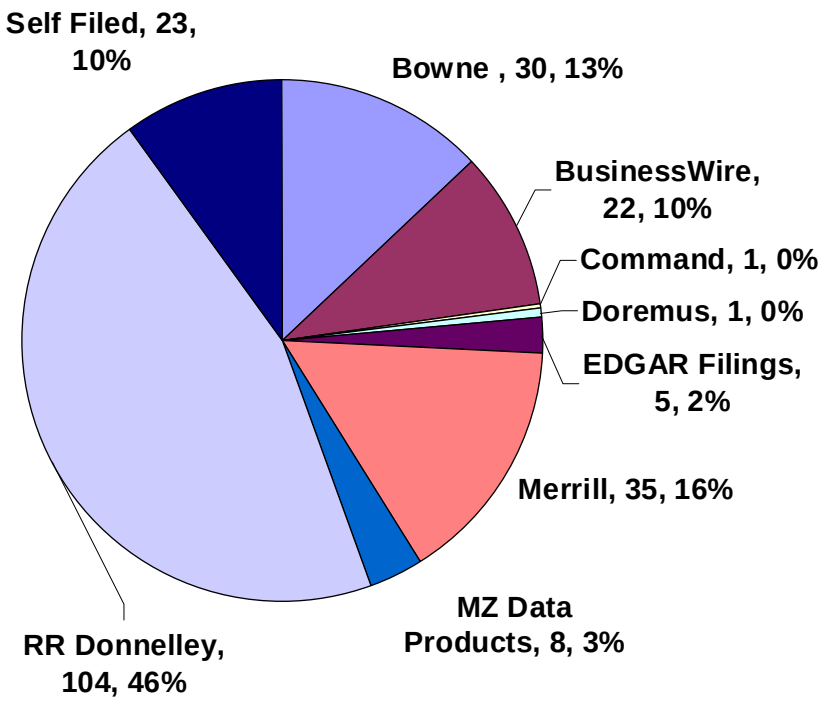
Taxonomy Experts will confirm edits and answer questions

Name	XYZ., Inc.	XYZ., Inc.	XYZ., Inc.	Client Initial Comments	Expert Response
Symbol	XYZ	XYZ	XYZ		
Period Dates	12/30/2007 - 1/3/2009	12/31/2006 - 12/29/2007	1/1/2006 - 12/30/2006		
Document Type	10-K	10-K	10-K		
Cash and Equivalents:					
Beginning of year	$277,800,000	$216,600,000	$373,300,000	**Should row 56 and row 57 have the same tag since one is at beginning of year and one is at end of year?**	**Yes, this is how the XBRL intended for these concepts in the C/F. In addition to the tag, the Pre and Lab files add a preferred label role (periodStartLabel and periodEndLabel) to differentiate these two tags**
End of year	$382,800,000	$277,800,000	$216,600,000	**Should row 56 and row 57 have the same tag since one is at beginning of year and one is at end of year?**	**Yes, this is how the XBRL intended for these concepts in the C/F. In addition to the tag, the Pre and Lab files add a preferred label role (periodStartLabel and periodEndLabel) to differentiate these two tags**

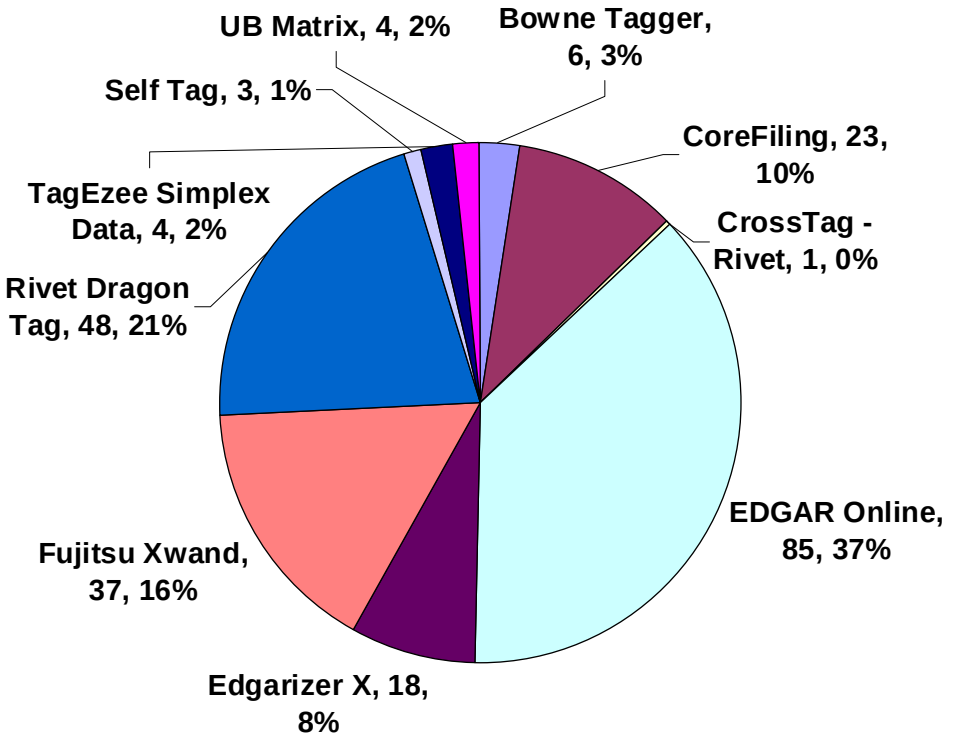
RR Donnelley EZ Start

Preferred Full-Service Solution in 2008

Segment Share – SEC Filings (229)



Segment Share – XBRL Tagging (229)



We filed 104 XBRL documents in 2008, over three times our nearest competitor

Source for Data – XBRL filings on SEC Website

Implementation Timeline and Recommendations

6 MONTHS PRIOR TO FILING

Explore Alternatives - In-house, full-service provider, embedded solution

- Most corporate issuers are using full-service provider
- Cost of implementing in-house can be significant
  - Cost estimate per SEC Final Rules issued 1/30/2009
    - $40.5K - $82.2K for 1st submission
    - Cost for subsequent submissions approx. 50% less per filing
  - Includes dedicated internal resources, consultants, software installation and maintenance

3 MONTHS PRIOR TO FILING

Develop and Test Process

- Tag a previously filed 10-K or 10-Q
- Test process including internal review (accounting/finance, legal, IR)

Next Steps

1. **Go to www.tryXBRL.com**
2. **Review peer filings at www.sec.gov**
3. **Contact RR Donnelley to discuss your data tagging alternatives**