The Committee of European Securities Regulators
11-13 avenue de Friedland
75008 Paris
France

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Call for Evidence on the Use of Standard Reporting Format for Financial Reporting

CFA UK is the UK member society for CFA Institute. The society has more than 9,000 members. Most members work as either buyside analysts or portfolio managers, though a healthy proportion (around 20%) also work as sellside analysts.

The society welcomes CESR's interest in standardized reporting formats for financial reports. The society believes in fair, efficient and transparent markets and we regard the provision of data in a standardized format as significantly supportive of market transparency and efficiency.

As noted in other submissions on this issue, the introduction of a standardized reporting format will enable analysts to derive comparable data faster and at a lower cost. XBRL is an appropriate format for consideration as it is open, freely available and globally applicable. While the society has not undertaken any independent research into the benefits and costs of XBRL adoption, we do not believe that the costs of implementation are significant and reckon that the benefits would be significant in terms of improvements to market efficiency. However, we note that the benefits would be sharply reduced if XBRL was only applied to the main statements in financial reports and accounts. Analysts make frequent use of footnotes and disclosures and XBRL tagging should also be available for those sections of reports.

We note that awareness of XBRL remains limited, but is growing (as is its use). We believe that the potential benefits of XBRL will increase over the next few years as accounting standards converge and comparability improves. XBRL's enhancements to the ease and speed with which analysts can extract data will then make an even greater contribution to market efficiency.

Yours,

Jane Fuller   Will Goodhart
Chair   Chief Executive
Financial Reporting & Analysis Committee, CFA UK   CFA Society of the UK