

17th July 2009

International Accounting Standards Board
30 Cannon Street,
London EC4M 6XH,
United Kingdom

Dear Boards' members,

Consejo Mexicano para la Investigación y Desarrollo de Normas de Información Financiera (CINIF) the accounting standards setter body in Mexico, welcomes the opportunity to submit its comments on the Exposure Draft: ***Due Process Handbook for XBRL Activities***. Set forth below you will find our comments to the topics included in the Exposure Draft (ED).

Comments related to topics not considered in the questions

- The CINIF considers that it is necessary to include a section with definitions in order to clarify the key terms used in the document and facilitate the understanding.
- We suggest clarifying which would be the procedures associated with the re-exposure of taxonomy and what are the requirements or triggers necessary for this to happen.
- We believe it is not very clear who approves the taxonomy at the end; we consider that the IASB and the trustees must be involved in this authorisation.

Question 1 – evaluation and alignment

Stages 2a (technology evaluation) and 2b (alignment of underlying IFRSs) consider conceptual activities in the areas of expertise of the XBRL team (technology and financial reporting). Does the emphasis on 'evaluation' and 'alignment' accurately reflect XBRL activities conducted during these stages?

Yes, we consider that the concepts of "technology evaluation" and "alignment of underlying IFRSs" appropriately describe the processes carried out during these stages.

Question 2 – IASB involvement in the due process for XBRL activities

The IASB is generally involved in the due process for XBRL activities in the alignment with underlying IFRSs (2b) stage, when the XBRL team consults technical staff on the IFRSs. Should the IASB have more involvement in the due process for XBRL activities?

Yes, we believe that the IASB should also participate in the *Stage 4: Review of taxonomy drafts* in order to guarantee a proper financial reporting content.

Question 3 – taxonomy development in alignment with the IFRSs

The Taxonomy alignment stage (2b) is guided by the standard approach, to ensure that the Taxonomy is aligned with IFRSs. The approach involves the scrutiny of each IFRS in turn, and considers the IFRSs published in the Bound Volume of IFRSs at the beginning of a calendar year, and also new IFRSs when issued. Do you agree that the Taxonomy development should be driven by underlying IFRSs?

Yes, we consider that changes to underlying IFRSs or new IFRSs should be the basis to include modifications in the Taxonomy.

Question 4 – draft taxonomies

At present the XBRL team develops the Taxonomy only for IFRSs. Should the XBRL team also consider exposure drafts of proposed IFRSs (such as standards for PEs and NPAEs), and develop draft taxonomies for these?

No, we think that developing the Taxonomy for EDs will result in confusion and unnecessary expenses because the project is not yet approved.

Question 5 – additional reporting components outside IFRSs

XBRL-based reporting may require components to be developed in addition to the Taxonomy (such as identification of filer, identification of submitted report, or additional information for automatic transmission). As stated in paragraph 11, the due process does not address such additional components. Should such exclusion be maintained, with the scope of the Taxonomy kept to only the disclosure requirements covered by IFRSs?

Yes, we think the exclusion should be maintained.

Question 6

The due process for XBRL activities is continuous and recurrent in character. This conflicts with the emphasis on the ‘final’ release of the Taxonomy. Should the emphasis be changed to reflect the annual character of the final Taxonomy?

No, we consider the emphasis should not be changed. The due process for XBRL activities is continuous and recurrent and not annual in character.

Question 7

Paragraph 39 outlines the ‘underlying considerations’ for the application of the due process for XBRL activities. The XBRL team also considered using the term ‘principles’ or ‘requirements’. Is the term ‘considerations’ correct?

Yes, we believe that the expression “underlying considerations” is appropriate.

Question 8

The XBRL team is part of the Interoperable Taxonomy Architecture (ITA) project. This joint initiative between the European Commission, the IASC Foundation XBRL team, the Japan FSA and the US SEC aims to achieve convergence of the XBRL architectures of three taxonomies: US generally accepted accounting principles (GAAP), Electronic Disclosure for Investors' NETwork (EDINET) and IFRSs. Should the co-operation within the ITA be addressed in the Due Process Handbook?

No, we do not consider necessary to address this project in the due process handbook because those taxonomies refer to other set of accounting standards different to IFRSs.

Question 9

The XBRL team co-operates with the IASCF Translations team for the translations of the Taxonomy. How should such cross-departmental cooperation be referred to in the Due Process Handbook?

We believe that it is very important that the XBRL and the IASCF Translation team ensure that all the technical terminology is properly translated in order to achieve consistent application of the Taxonomy. Thus, the translation process should be included as part of the *Stage 5: Taxonomy publication and maintenance*, because it is part of the steps required to publish the taxonomy.

Question 10

The underlying considerations state that 'usability' is important for the due process. This aims to increase adoption of the Taxonomy by stakeholders. There is a degree of conflict with this and the view expressed in paragraph 40 where the principal stakeholders of the Taxonomy are stated as being investors. Should investors remain the primary stakeholders of the Taxonomy?

The CINIF does not agree with this view. Firstly, we consider that even though investors represent an important part of users, there are also other important internal and external users such as lenders, employees, suppliers, government, management, clients, etc. These other users require also financial information to make economic decisions and are interested in the financial position and performance of the entity. For example, CINIF considers management also as part of the general users of financial information because it requires to assess its performance according to the results the financial information shows. Management is at the same time the issuer and the user of the financial information as well as any other additional information.

Should you require additional information on our comments listed above, please contact me at 00-52-55-5596 5633/26/34 or by e-mail at fperezcervantes@cinif.org.mx

Sincerely,

C.P.C. Felipe Perez Cervantes
President of the Mexican Accounting Standards Board
Consejo Mexicano para la Investigación y Desarrollo
de Normas de Información Financiera (CINIF)