

DQC Public Exposure comments received online as of September 1, 2016

“Axis with Inappropriate Members” (DQC_0001)

1. *Shelly Wavrin* says:

[Thursday, August 4, 2016 at 12:49 PM \(Edit\)](#)

Currently the Currency [Axis] allows extension: OtherCurrencyMember, NonUSDollarMember, SICAD1Member, and SICAD2Member.

Please see the attached example and consider adding the following extensions:

- CENCOEX
- SICAD
- SIMADI
- DIPRO
- DICOM

Attachment [DQC_0001_CurrencyAxis.docx](#)

[Reply](#)

2. *Shelly Wavrin* says:

[Monday, August 8, 2016 at 5:29 PM \(Edit\)](#)

Rule element ID#69: Products and Services [Axis]

Public utility entities may use Products and Services [Axis] with members such as Water [Member] or Propane [Member]. These members are located in Taxonomy section 980000 (on the PublicUtilitiesInventoryAxis). Please consider adding members on PublicUtilitiesInventoryAxis to Rule ID#69.

[Reply](#)

3. *kotte Narasimharao* says:

[Tuesday, August 9, 2016 at 6:20 AM \(Edit\)](#)

Are there any particular axis which does not allow the extension under it? If so describe them.

[Reply](#)

4. *Shelly Wavrin* says:

[Tuesday, August 16, 2016 at 11:11 AM \(Edit\)](#)

Currently the Consolidation Items [Axis] allows extended members:
CorporateReconcilingItemsAndEliminationsMember,
CorporateAndReconcilingItemsMember, CorporateAndEliminationsMember,
EliminationsAndReconcilingItemsMember.

Please see the attached example and consider adding an extension member:
OperatingSegmentsMemberAndCorporateNonSegmentMember.

This member is needed for companies disclose the total of "Operating Segments" and
"Corporate, Non-Segment", before elimination and reconciliation items.

Attachment [_DQC_0001_ConsolidationItemsAxis.docx](#)

[Reply](#)

5. *Shelly Wavrin* says:

[Monday, August 22, 2016 at 4:45 PM \(Edit\)](#)

Rule element ID#69: Products and Services [Axis]

The axis allows CommercialRealEstateMember. Please see the attached example and
consider adding ResidentialRealEstateMember.

Attachment [_DQC_0001_ProductOrServiceAxis-2.docx](#)

[Reply](#)

“Negative Values with Dependence”

1. *Shelly Wavrin* says:

Wednesday, August 3, 2016 at 3:53 PM

Consider removing element `us-gaap_EffectiveIncomeTaxRateReconciliationNondeductibleExpense` from this rule.

DQC_0015 does not include the element: `us-gaap_IncomeTaxReconciliationNondeductibleExpense` (monetary element) because not all the components of this element are subject to DQC_0015. For example, the component `IncomeTaxReconciliationNondeductibleExpenseShareBasedCompensationCost` often includes reversal and thus a negative value is allowed.

We believe the same methodology should be applied to the “percent” type element.

Please see attached example.

Attachment [DQC_0013_EffectiveIncomeTaxRateReconciliationNondeductibleExpense.docx](#)

[Reply](#)

“Negative Values – Additions to Existing Rule”

1. *Shelly Wavrin* says:

[Wednesday, August 3, 2016 at 3:54 PM \(Edit\)](#)

Consider removing element `us-gaap_RecognitionOfDeferredRevenue` from this rule.

While we agree that values should generally be positive for this element, occasionally we see negative values in the interim financial statements, possibly due to timing of invoicing or reversal.

Please see attached example.

Attachment [DQC_0015_RecognitionOfDeferredRevenue.docx](#)

[Reply](#)

2. *Shelly Wavrin* says:

[Wednesday, August 10, 2016 at 9:25 AM \(Edit\)](#)

Please consider removing element `us-gaap_MinorityInterestDecreaseFromRedemptions` from this rule.

While we agree that values should generally be positive (debit to equity) in the domain, occasionally we see negative values (credit to equity) presented, possibly due to a deficit noncontrolling interest balance prior to redemption.

The attached example shows a debit balance in 2015, and a credit balance in 2016.

Attachment [DQC_0015_MinorityInterestDecreaseFromRedemptions.docx](#)

[Reply](#)

3. *Shelly Wavrin* says:

[Wednesday, August 24, 2016 at 4:48 PM \(Edit\)](#)

For companies that have liabilities such as derivatives comprising defined benefit plan assets, the values on a dimension could be negative. Please consider removing element `us-gaap_DefinedBenefitPlanFairValueOfPlanAssets` from this rule, until FASB issues guidance on whether these liabilities should be tagged as negative assets, or a pension liabilities element and pension assets gross element should be created.

Please see the attached examples.

Attachment [_DQC_0015_DefinedBenefitPlanFairValueOfPlanAssets.docx](#)

[Reply](#)

4. *Shelly Wavrin* says:

[Thursday, August 25, 2016 at 1:49 PM](#) ([Edit](#))

Please consider adding StatementBusinessSegmentsAxis to the listing of member exclusions (DQC_0015_MemberExclusions).

Many files have negative values (generally immaterial) presented in segment members, possibly due to allocation/transfers among the reporting segments.

Please see the attached examples.

Attachment [_DQC_0015_StatementBusinessSegmentsAxis.docx](#)

[Reply](#)

“Guidance on Tagging Axis and Members Using the US GAAP Taxonomy”

1. **Filed under “Axis with Inappropriate Members”** *Nicholas Messing* says:

[Friday, July 1, 2016 at 10:14 AM \(Edit\)](#)

Overall this looks like excellent and helpful guidance. I noticed that the current format provides definitions for some but not all of the allowed extensions.

For “Fair Value, Hierarchy [Axis]” and “Position [Axis]”, the allowed extensions are listed in narrative text. Should they be broken out in a table, with definitions provided, similar to “Currency [Axis]” and “Consolidation Items [Axis]”? For “Hedging Designation [Axis]”, the allowed extension members are broken out with bullet points, but without definitions. It seems like the format and information provided should be consistent for the allowed extensions.

Also, a grammatical note for the suggested extension member definitions under “Consolidation Items [Axis]” – should “nonoperating” be one word, and should periods be added?

[Reply](#)

1. *Nicholas Messing* says:

[Friday, July 1, 2016 at 10:19 AM \(Edit\)](#)

Above comment refers to “Guidance on Tagging Axis and Members Using the US GAAP Taxonomy”.

[Reply](#)

2. *Lindsey Jones* says:

[Wednesday, August 10, 2016 at 11:24 AM \(Edit\)](#)

Please consider adding an extension member for the Consolidation Axis that includes eliminations, the corporate segment, and other operating segments that are not material to present separately (i.e. OtherAndIntersegmentEliminationsMember). None of the suggested members encompass all three of these items.

[Reply](#)

3. **Filed under “General Feedback”** *Emily Conkling* says:

[Wednesday, August 10, 2016 at 2:36 PM \(Edit\)](#)

I agree with the previous comment "Please consider adding an extension member for the Consolidation Axis that includes eliminations, the corporate segment, and other operating segments that are not material to present separately (i.e. OtherAndIntersegmentEliminationsMember). None of the suggested members encompass all three of these items."

The use of one of the suggestions without the 'other' would not accurately describe what our disclosure represents. Further, each of the components (i.e. corporate, other immaterial operating segments, and intersegment eliminations) is equally represented in the total amount being disclosed. The suggested extension would be a combination of us-gaap elements CorporateAndOtherMember and IntersegmentEliminationMember.

[Reply](#)

4. *Amber Knecht* says:

[Wednesday, August 10, 2016 at 2:41 PM](#) ([Edit](#))

I agree with the comment above.

[Reply](#)