

May 1, 2024



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Office of Structured Disclosure  
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Securities and Exchange Commission  
100 F Street NE  
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To Whom It May Concern:

RE: Draft 2024 Daily Market Data Report (DMDR) Schema and Report Renderer

Thank you for the opportunity to provide input to the Draft 2024 Daily Market Data Report (DMDR) Schema and Report Renderer. XBRL US is a nonprofit standards organization, with a mission to improve the efficiency and quality of reporting in the U.S. by promoting the adoption of business reporting standards. XBRL US is a jurisdiction of XBRL International, the nonprofit consortium responsible for developing and maintaining the technical specification for XBRL. XBRL (eXtensible Business Reporting Language) is a free and open data standard widely used in the United States, and in over 200 implementations worldwide, for reporting by public and private companies, as well as government agencies. The schema and supporting guide for the DMDR Draft was reviewed by members of XBRL US.

Our primary comment pertains to the SEC rule requirements for data submission. The rule that is supported by the DMDR Schema calls for data reported to be posted on the company web site. We strongly encourage the Commission to require reporting companies to also be required to submit reports to the EDGAR system. Posting to the company website alone is problematic for data consumers in that data on a company website may require a login or may even lie behind a firewall. Even if freely posted, company website posting alone will require data consumers to search to find data of interest. All of this hinders free and timely access to data. Posting to EDGAR would eliminate this issue.

Separately, we also ask the Commission to include technical guidance for reporting entities on the frequency of possible revisions to the schema. This would be helpful for companies and for the vendors that support them.

We appreciate the opportunity to provide input to the process. Please let me know if any of our questions need further clarification. I can be reached at (917) 582-6159 or [Campbell.Pryde@xbrl.us](mailto:Campbell.Pryde@xbrl.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Campbell Pryde". The signature is fluid and cursive, with the first name "Campbell" written in a larger, more prominent script than the last name "Pryde".

Campbell Pryde  
President and CEO, XBRL US