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August 24, 2026

Christopher Kirkpatrick, Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW
Washington, DC 20581

Vanessa A. Countryman, Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

RE: Joint Request for Comment on Swap and Security-Based Swap Data Reporting
CFTC - RIN 3038-AF70
SEC - File Number S7- 2026-22

We appreciate the opportunity to provide input to the Joint Request for Comment on Swap and Security-Based Swap Data Reporting published by the Commodity Futures Trading Commission (CFTC) and the Securities and Exchange Commission (SEC). XBRL US is the nonprofit data standards organization that supports open, structured data standards to produce economies of scale and ensure good quality, transparent, and accessible data for market participants.

The eXtensible Business Reporting Language (XBRL) standard is required for financial data disclosures submitted to U.S. regulators including the FDIC (Bank Call Reports since 2005), the Securities and Exchange Commission (US GAAP financial statements since 2009), and the Federal Energy Regulatory Commission (utilities reporting since 2021). XBRL is widely used around the world for reporting by millions of entities under the jurisdiction of hundreds of global regulatory agencies. Reporting entities, including private and public companies, banks, utilities, and government entities, have been preparing data in structured (XBRL) format for decades, resulting in a significant pool of historical and regularly updated structured, machine-readable data relied on by investors, regulators, researchers, and other data consumers worldwide.

We support the goal of the Commissions to rationalize and simplify reporting so that it will serve its intended purpose while maximizing the accuracy, completeness, timeliness, and integrity of reported swap and SBS data. We support the use of common data elements and structured data standards across agencies to improve data interoperability, integrity, and usability. Adhering to the same structured data reporting across both agencies will enable economies of scale that will benefit issuers, regulators, and data consumers as the cost of software applications leveraged across many users is less costly than applications that can only be used with a limited number of users. Data generated in structured, consistent format optimizes the use of AI-powered tools.

We also support the use of the Legal Entity Identifier (LEI) to ensure transparency and consistency, efficiently and cost-effectively.

Thank you for the opportunity to provide input to this rule proposal. If you have questions or would like to discuss further, I can be contacted at (917) 582-6159 or Campbell.Pryde@XBRL.US.

Sincerely,

Campbell Pryde
President and CEO, XBRL US