

EBA Consultation Taxonomy Technical Feedback

ERFAHRUNG FLEXIBILITÄT INNOVATION

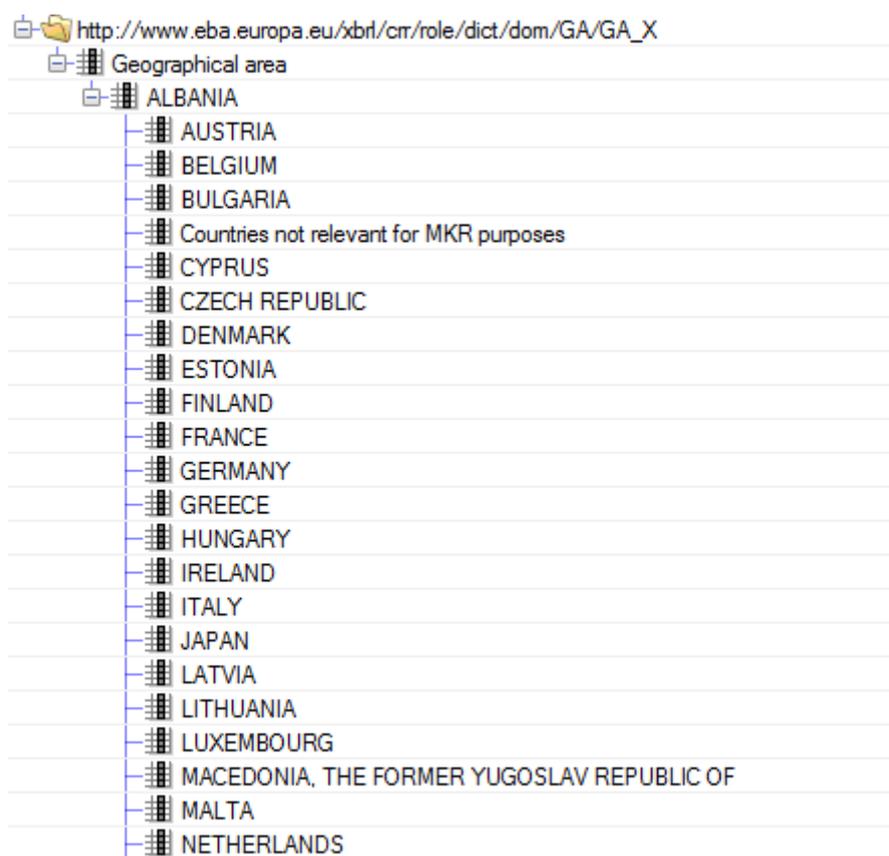


AMANA
consulting

This is a response to the EBA consultation on the ITS XBRL Taxonomy, from 19th of September 2013. AMANA consulting GmbH is a consulting company. Its XBRL reporting solutions are used by many banking clients in Germany. This includes an own XBRL processing engine implementation, and GUI applications for FINREP/COREP and other XBRL based filing types.

We appreciate the use of XBRL for FINREP and COREP filings. The well-known standard has many benefits as a unique reporting format in Europe and abroad. Especially the new introduced Table Linkbase Specification 1.0 adds more value to XBRL as electronic way to express forms and its data. We are really glad to see that the EBA and the EIOPA are working together on similar technical bases. We would endorse if all the European NSA's will make use of the XBRL Taxonomy too, and any further (new) reporting framework in Europe will rely on the same XBRL technology.

We are glad to see the XBRL Taxonomy evolving and with all its releases, and are happy that only small "bugs" are still present (e.g. all countries as a child of "Albania" in the "Geographical Area" hierarchy, see screenshot), that we expect to be fixed soon.



However, during our tests with the EBA Taxonomy we are facing a few technical challenges. In the following paragraphs we are going to address all aspects which seems to be important for us, to ensure a successful implementation of a reporting system.

General XBRL Taxonomy Architecture

The use of the Table Linkbase is a good choice and reasonable. But the specification itself is still not final, and changes very often. We really like the use of it, but we need time to implement the latest changes within the specification into our software, which needs time. Please do not mandate banks to file before the Table Linkbase Specification is in a final state.

In addition to that, we have concerns about the fact that the Table Linkbase makes heavily use of XPath 2.0 expressions, due to its use of the XBRL Formula Linkbase Variable Specification. That allows an easy way of rendering XBRL instance documents, but it makes it complicated if the table view is used for data entry, which is clearly defined as a use case within the specification. Please don't rely too much on XPath expressions, to enable the use of the Table Linkbase without having an XML instance document in place. We will address this topic to the XBRL Table Linkbase working group too. The same goes for the Formula Linkbase validation rules, see below.

In general, we appreciate a XBRL Taxonomy package with multiple entry-points. During our FINREP projects, we found out that the local caching that is currently used, usually leads to deployment problems. The rewrite options that are added to the Taxonomy package can solve this, but not for a single entry point, that is used. On the other hand, having all these files online, would also lead to a massive file downloading during XBRL DTS resolving process. Our suggestions to solve it: Do not make use of Taxonomy/schema references pointing to online resources (or just a minimal part), and change it to local referenced files, if not already the case.

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We also support a general, more detailed description and/or recommendation about the XBRL Taxonomy and instance document architecture, as the documents provided by the CEN/WS working group of the Eurofiling initiative.

Data Point Model and XBRL Taxonomy

The table ID that is used to identify a FINREP/COREP table with the XBRL Role URI, is very important for many scenarios. It allows us to map certain data to a table identified by the table ID. Our experiences with the previous taxonomies is, that it is really important not change the table IDs constantly. Please provide for future taxonomies a unique, stable, table ID, and a proper versioning of the tables, if it's not a completely changed table. This will be very helpful.

We also saw tables which are divided into different parts (can be identified by an appendix, e.g. "F_08.01.a" or "F_08.01.b"). This tables were defined as single tables in previous Excel reports of the table views, which is confusing for business user, who expect the same table view, whether it's in the Excel report or the XBRL Taxonomy.

Regarding the visual table size, we think that it should be limited to a maximum of 1000 value cells; otherwise its becoming complicated to view/edit/print the actual tables.

Validation of Table Values

The FINREP/COREP Taxonomy includes a XBRL Formula Linkbase with many value assertions. In general, we appreciate the use of existing XBRL specifications, but the Formula Linkbase assertions are a massive and complex way to express that cell value "c = a + b". We found it very interesting that you shipped an Excel workbook containing all formulas in a simple grammar additionally to the Taxonomy. We developed a very small expression parser that can parse this kind of formulas, and validate it on the table model object that is generated by the XBRL processing engine. The effort of developing such a simple parser without using the XBRL Formula Linkbase was pretty small. Another disadvantage of the Formula Linkbase for validation purpose is the missing link of the table cells generated accordingly to the Table Linkbase Specification and the formula variables. Of course, a good software tool should display the validation results directly attached to a cell, and not as a flat list that is available for the whole filing. This seems – by today- quite complex to achieve. Please see the following screenshot of our custom developed validation engine that is processed on the normal XBRL Table Linkbase model object. This solution is also used for custom validations, which can be easily set up by our business users.

Table 3.3. Breakdown of financial assets by instrument and by counterparty, Available-for-sale financial assets	Fair value of unimpaired assets	Fair value of impaired assets	Carrying amount
Equity instruments	31	34	38
of which: at cost	3		
of which: credit institutions	6		
of which: other financial corporations	9		
of which: non-financial corporations	12		
Debt securities	15		
Central banks	18		
General governments	21		
Credit institutions	24		
Other financial corporations	27		
Non-financial corporations	30	31	32
Loans and advances	31	34	35
Central banks	36	37	38

Account-Number: 33010020
RC Codes: 1020
Aspects: Base Concept
eba_metm:53Name: eba_metm:53 Duration: Instant Balance: Unknown Type: http://www.xbrl.org/2003/instance:moneta
Explicit Dimensions: eba_dim:3M eba_JMx:10
Explicit Dimensions: eba_dim:BAS eba_BASx6
Explicit Dimensions: eba_dim:MC eba_MCx447
Explicit Dimensions: eba_dim:PL eba_PLx56
Fact: AMANA.XBRL.Engine.Plugin.TableLinkbasePlugin.TableModel.EmptyData
Validation result:
Validation result of formula [r010] >= sum ([r020-050]), cell | in table F 03.03: Validation successfully with result True

Due to this reason, we would be glad if you could add the Excel validation file as a regular extension to the Taxonomy for future releases, and think about a proper integration of table value cell validations.

Open “Typed Dimension” Tables

The use of typed dimensions within the Taxonomy seems reasonable and required for a few tables. However, we recommend you to limit the use to the following extend: Please avoid “nested XML typed dimension values” (XML complex schema types) as typed dimension values. This is well defined by the XBRL specification, but it makes it complex to identify a certain table line. The uses of simple types for typed dimension values will ease the mapping process for these tables.

Additionally, please avoid multiple typed dimension filters (Formula Dimension Filters) per axis, and keep its use limited and easy.