

September 4, 2026

PCAOB
Office of the Secretary
1666 K Street NW
Washington, DC 20006-2803



1345 Avenue of the Americas
27th Floor
New York, NY 10105
Phone: (202) 448-1985
Fax: (866) 516-6923

To Whom It May Concern:

RE: PCAOB Release No. 2026-006 - PCAOB's Draft 2026-2030 Strategic Plan Goals and Objectives

Thank you for the opportunity to provide feedback to the PCAOB 2026-2030 Strategic Plan Goals and Objectives. XBRL US is a nonprofit data standards organization, and a jurisdiction of XBRL International, the nonprofit consortium responsible for developing and maintaining the technical specification for eXtensible Business Reporting Language (XBRL), which is a free and open data standard widely used around the world for reporting by public and private companies, as well as government agencies. U.S. public companies and investment management companies submit their financials to the Securities and Exchange Commission (SEC) each quarter in standardized XBRL format. The SEC program began in 2009 so that today, 17 years of historical, structured, machine-readable data is freely available for use and is updated each quarter.

XBRL US submitted a comment letter on May 15, 2026, in response to [PCAOB No. 2026-001 - 2026-2030 Strategic Plan](#). We agree with the goals outlined in the PCAOB Strategic Plan Goals and Objectives. Our response builds on our previous letter and provides input on specific PCAOB Goals.

Goal 1: Modernize Standard Setting and Implementation

To meet its goal to “*Advance audit quality and clarify what constitutes a high-quality standard*,” we encourage the PCAOB to consider the [Verifiable Legal Entity Identifier \(vLEI\)](#) as a standard that can help the audit process. The vLEI is a secure, digital version of a traditional Legal Entity Identifier (LEI) that uses cryptography to let organizations verify their identity online. The vLEI is a form of “digital passport,” acting as a trusted electronic ID for businesses and legal entities that enables cryptographic trust and role verification. The vLEI can assist the audit process by creating tamper-proof audit trails. A financial statement or transaction signed with a vLEI is completely sealed; any subsequent alteration of the document breaks the digital signature so that auditors can identify fraudulent reporting immediately.

The vLEI can verify multi-signatory signing, allowing corporate and external auditor cryptographic signatures on specific sections of a report. It enables the verification of delegated authority and corporate roles and automates Know Your Business (KYB) processes.

Another standard that we encourage the PCAOB to consider is the [Digital Signatures in XBRL 1.0 standard \(known as D6\)](#) which provides a secure, technology-agnostic method for applying

legally recognized digital signatures to XBRL and Inline XBRL reports. AI makes it easier to fake financial statements, heightening the risk of market manipulation. The D6 specification can help auditing by transforming unstructured electronic signatures into cryptographically sealed, machine-verifiable proof of data integrity and accountability. Concrete verification has never been more important.

Goal 5: Modernize Oversight Through Technology and Data

We support the PCAOB plan to “... *leverage data-driven and technology-enabled oversight capabilities to strengthen risk identification, inform regulatory judgments, and enhance the effectiveness, consistency, and timeliness of standard setting, inspections, enforcement, and other oversight activities.*”

As explained in our previous comment letter, PCAOB access to granular, concretely structured company financial statement data, continuously updated and available back to 2009, provides an ideal resource to reliably, cost-effectively identify anomalies and situations where company financials may not adhere to US GAAP standards. Company disclosures can be reviewed more broadly and consistently to identify weaknesses.

Artificial intelligence tools paired with corporate XBRL formatted data is a powerful combination that will help the PCAOB meet their objectives efficiently and cost-effectively.

When Large Language Models (LLM) are given access to data sets, they discern meaning by breaking content into tokens, organizing those tokens using location, contextual cues, and prior training, and then predicting what comes next based on what has been provided. With unstructured content (PDF, Word, Excel), meaning is inferred from visual structure (rows and columns, font weight), general model training, and prediction. Unstructured data files like PDF or Excel come in many different formats and are often structured differently. Tokenization can misalign table structure.

With structured content that leverages a semantic data model (like the XBRL SEC data available to the PCAOB today), meaning comes from granular embedded context that is “wrapped” around each value - data type, definition, label, dimensional characteristics, and relationships between values. The contextual information about a fact is presented in a consistent structure, so an LLM interprets data that adheres to the same semantic model the same way and its predictions improve accordingly.

We asked Anthropic’s Claude LLM to extract a single data point from a financial statement (Form 10-K for fiscal year ended June 30, 2026) prepared by Malibu Boats, Inc., a public company reporting to the SEC. To perform the extraction from a PDF version of the financial statement, the LLM first found the appropriate form and used the Table of Contents to identify the location of the financial statement table. It then reads the rows and columns of the table to identify the value. Performing the same data extraction using XBRL-formatted data, the LLM read the wrapper around the XBRL data point to find meaning. The LLM estimated the token cost of PDF extraction

at 31,500 tokens. The cost of XBRL extraction was estimated at 7,500 tokens, a 76% reduction in token cost required when working with structured data.

A recent academic study, [AI determinants of success and failure](#), found that extracting data contained in the footnotes to the financials is even more dependable than data extraction from the face financials with structured versus unstructured data. Structured data also assists in eliminating LLM hallucination and misinterpretation.

The highly structured nature of XBRL-formatted financials makes it easy to create validation rules that can be automatically and inexpensively run against structured company financials to identify issues such as incomplete or missing disclosures, or errors in how accounting standards were applied. Automation allows more robust analysis. Reviewing 5,000 companies can be conducted as quickly and efficiently as analyzing a single company on a manual basis.

The ability to perform robust automated checking against the outcome of AI tools is critical to verify accuracy. When an LLM discerns meaning from unstructured data, the only way to check accuracy is through manual checking. This is not only labor-intensive and expensive but likely to result in errors as thorough checking cannot be performed cost-effectively. For the important work of the PCAOB, accuracy cannot be sacrificed.

The net effect is that structured data is significantly less expensive and more accurate than working with unstructured data.

The PCAOB can take advantage of the LLM tools on the market by using these tools most effectively on the vast pool of corporate SEC structured data already available. Efficient use of LLMs is becoming more and more critical because costs are rising as VC/PE funders recoup their investment. While competition in the LLM space may ultimately drive down prices, more market entrants mean even greater variation in AI outcomes across numerous providers. These trends make the availability of XBRL-formatted corporate data even more critical to perform the work of the PCAOB reliably and cost-effectively.

Thank you for the opportunity to provide input to the PCAOB Draft 2026-2030 Strategic Plan Goals and Objectives. Do not hesitate to engage us in your discussions and questions related to standards. I can be reached at Campbell.Pryde@xbrl.us or (917) 582-6159.

Sincerely,



Campbell Pryde
President and CEO, XBRL US