February 18, 2022

Certent is a 3rd party filer for Section filers using our propriety software. Members of our Section16 development team have been attending the recent EDGAR Next comment sessions and have some concerns.

These are the steps we follow, roughly, for filing in our application:

1. Create a Form and be ready to submit – [This is our application where human interaction is required]
2. Click on File Form(s) – [Human interaction is required] – submitting one or multiple forms queued up for a bulk submission with a single API
3. Transferred over to ==automated steps== using scheduler
    a. Filed form or forms are picked up the scheduler – RUNS every few minutes
    b. Site availability check - https://www.onlineforms.edgarfiling.sec.gov/Welcome/EDGAROnlineFormsLogin.htm
    c. Login verification check with URL - https://www.onlineforms.edgarfiling.sec.gov/servlet/MultiHandlerServlet   (with ==cik==,   ==password== and ==EDGAR&handler=login&clientURL=https://www.onlineforms.edgarfiling.sec.gov/&loginApp=onlineForms== query parameters)
    d. Send the form to Edgar - https://www.onlineforms.edgarfiling.sec.gov/servlet/MultiHandlerServlet (with ?handler=uploadfile&ftype===SingleLive== or ?handler=uploadfile&ftype===SingleTest== query parameters)
    e. Get the accession number
    f. Check for Retrieve from submission information - https://www.onlineforms.edgarfiling.sec.gov/servlet/MultiHandlerServlet?handler=writepage&pageName=/CompanyInfo/EDGAR_CIK_CCC.htm (with ==cik==, &CIK_CCC=Continue&handler=cikccc query parameters)
    g. If the above step is true get the accession text - https://www.onlineforms.edgarfiling.sec.gov/servlet/MultiHandlerServlet?handler=retrievefile&ext=sef&accnum= (with ==accession== number as query parameters)
    h. Based on the accession test we have our own process to let the user know whether the form has been filed successfully or not.

Question to Edgar – Keeping the above steps in mind how can we convert the steps mentioned after #1, with the new proposed architecture for EDGARNext?

Respectfully,

Liz Park on behalf of

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