

November 30, 2021

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

RE: Potential Technical Changes to EDGAR Filer Access and Filer Account Management Processes,  
File Number S7-12-21

Dear Ms. Countryman:

Thank you for the opportunity to comment on the potential changes to the EDGAR System with the EDGAR Next project.

Confluence has been providing cloud-native software solutions for global regulatory reporting requirements to clients since 2015. As part of those solutions, Confluence acts as a Filing Agent to clients for SEC forms submitted through the EDGAR Filing Website via an automated filing process.

Confluence supports and commends the Commission's efforts towards modernizing the filing process and improving the security of EDGAR. However, the proposed changes focus only on improving the human interactive process of submissions to EDGAR. Equally as important is the modernization of automated filing processes that many filers rely on to submit filings to the SEC at scale. The proposal does not allow for a good solution for automated filing submissions. We recommend that the Commission explore creating a solution that not only improves human interactive processes, but also the experiences of filers leveraging automated systems, with a key objective to not degrade the existing capabilities of regulated filers leveraging automated systems to streamline their already time-sensitive filing processes. We recommend the assessment of other options to facilitate the modernization of automated filers including application programming interfaces or alternative secondary authentication factors such as certificates.

We appreciate your consideration of this topic. Confluence stands ready to assist the Commission in its mission to modernize EDGAR. If the Commission has any questions, please feel free to reach me at [REDACTED].

Respectfully submitted,

Thomas Pfister  
Vice President of Global Product Strategy  
Confluence Technologies, Inc.