

Via Electronic Mail

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

RE: Comments on File Number S7-12-21

Greetings Secretary Countryman and Commissioners,

The Filer Consortium appreciates the opportunity to provide comments on the Securities and Exchange Commission's ("SEC") request for comment on potential technical changes to the EDGAR (Electronic Data Gathering Analysis and Retrieval) filer access and filer account management processes.

The Filer Consortium is comprised of filing agents, law firms and software companies. We represent approximately 80% of all submissions filed on the EDGAR system using systematic automated protocols.

We applaud the SEC's efforts and fully support the implementation of enhanced cybersecurity protocols and modernizing the EDGAR system. We would like to collaborate with the SEC through these EDGAR Next modernization stages. Through collaboration, the SEC builds a community who are aligned with the EDGAR Next modernization to achieve the stated results, increasing security and improving efficiencies and processes throughout the EDGAR eco-system. However, EDGAR Next as presented in the Beta provides insufficient testing to understand the implications of transmitting EDGAR submissions outside of an automated system-to-system environment which introduces additional manual processes, risk of transmission failure and potentially late filings submitted to the SEC.

Registrants rely on the SEC EDGAR eco-system to meet existing and proposed disclosure obligations, the full eco-system, including filing agents and SaaS products, are needed for a fully functioning capital markets lifecycle. While we recognize the need to enhance security, minimize risk and create transparency for the EDGAR filing eco-system, to ensure that the goals of the proposed rules can be fully realized, a short period of testing of the entire filing life cycle would uncover any potential technical issues prior to final implementation. Absent a Beta with full life cycle functionality, we are limited in our ability to comment on the replacement to the current EDGAR filing system or identify the systemic risks and challenges expected throughout the EDGAR reporting eco-system.

Additionally, we respectfully ask that the Commission extend the deadline to ensure that they can receive well-thought-out input from filing agents and registrants. EDGAR Next will be a significant change from the current filing submission process. Receiving the appropriate feedback is critical to ensuring the efficient processing of filings as the SEC works to modernize the EDGAR process.

Respectfully submitted,

The Filer Consortium,
DFIN, Toppan Merrill, Workiva, M2 Compliance, Paul Weiss, EdgarAgents, Business Wire,
Command Financial, Broadridge Financial Solutions