



## **Gartner Position Regarding Sarbanes-Oxley and Gartner Dataquest Market Statistics**

With the advent of Sarbanes-Oxley (SOX) financial reporting requirements in the U.S., some IT vendors have suggested that Gartner should require SOX-level certification on Gartner Dataquest market data surveys. This would involve requiring vendors to submit data and survey responses certified under their CEOs and/or CFOs signature(s). The belief is that this requirement would enhance accuracy of the overall results.

It is Gartner's position that this approach to data collection would be flawed for the following reasons:

- Gartner's surveys are not analogous to financial reports issued to the investing public, and do not fall under the legal purview of SOX regulations.
- Gartner does not have the right or ability to require CEO/CFO signatures.
- The variety of markets and the segmentation of those markets do not lead to an easily implemented SOX-style format for surveys nor would they necessarily be easier for the vendor community to complete. For example, Gartner may divide a market by ranges of speed that differ from those used by vendors in their internal categorizations.
- The differences in the distribution channels in different markets make Gartner Dataquest results only partially dependent on "into the channel" data that comes directly from the vendors and hence could be certified. Substantial effort goes into determining the market dynamics at the end of the channel.
- The differences in revenue recognition techniques, particularly in the software segments, result in individual companies' certified data adding little if any value to constructing a market-wide viewpoint.
- There is a substantial amount of effort in building the overall reports such that any data provided by the market is subject to further analysis.

Given those six limitations on Gartner's ability to gather and rely solely upon data with a SOX-like certification, Gartner will gladly accept any CEO/CFO-certified data that a vendor wishes to submit. Certified data will be viewed as another input to the research process. In instances where such data appears in a published report or comprises the majority of the data in a market estimate, Gartner will acknowledge those vendors who submitted data that was certified in a SOX-like manner.

Source: Vendor Relations  
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Subject to change at Gartner's discretion