# IRISH FREE SOFTWARE ORGANISATION
## Promoting and Defending Free Software in Ireland

iFSO

January 29, 2007

## Objections to JTC-1 Fast-Track Processing of the ECMA-376 Specification

To whom it may concern,

On behalf of the members of the Irish Free Software Organisation, I am writing to you to express a number of concerns regarding the fast-track processing of the ECMA-376 specification at the ISO JTC-1 committee. The unusual size of the specification, and the limited time to review the document precludes an exhaustive examination, however we present a number of specimen objections to the current proposal:

1. The specification, by virtue of its size, cannot be meaningfully reviewed within the 30 days permitted by the fast-track procedure.

2. The specification contradicts, duplicates and conflicts with a number of existing ISO standards, including: ISO8601 (Representation of dates and times), ISO 639 (Codes for the Representation of Names and Languages), ISO/IEC 8632 (Computer Graphics Metafile), ISO/IEC 26300:2006 (OpenDocument Format for Office Applications).

3. The standard as proposed is internally inconsistent in many places, including using inconsistent units of measurement and inconsistent naming conventions.

4. The standard relies on a number of undisclosed proprietary specifications, including the use of the undocumented "Windows Metafile" format, and references to the behaviour of proprietary applications without any description of what this behaviour consists of. As a result of this lack of specification ECMA-376 cannot reasonably be implemented by vendors other than the Microsoft corporation, providers of these proprietary applications.

For these reasons, and others, we believe it is inappropriate to admit this standard to the fast-track process, and we urge that it be remanded to Ecma International for: (i) harmonization with ISO/IEC 26300:2006, the OpenDocument standard; and numerous other standards that it contradicts; (ii) development of more suitable intellectual property documents that actually grant rights to implement the specification.

Further analysis of the document can be found online at `http://www.grokdoc.net/index.php/EOOXML_objections`

Yours sincerely,

Glenn Strong
(Chairman)