

Ian Cowan,
Secretary to the ICT Standards Consultative Committee,
NSAI,
Glasnevin,
Dublin 9,
Ireland

March 11, 2008

Objections to ISO/IEC DIS 29500: OOXML standard

Dear Dr Cowan,

Re: Draft ISO/IEC 29500 standard (“OOXML”)

We are writing in connection with Ireland’s final vote on the above application for ISO approval. As contributors to the NSAI’s earlier stages of this process, we wish to indicate that our position on the acceptability of the proposed standard text has not changed.

Ireland’s vote on the original draft, cast on 31 August 2007, recorded “Disapproval — with Technical Comments”. NSAI’s press release from the time explains: “If the Technical Comments are satisfactorily resolved and incorporated into a new draft, the vote is subsequently amended to Approval.”

According to reports, the week-long Ballot Resolution Meeting was far too short to satisfactorily address the issues raised by the national bodies last September. For 80% of the 1,100 changes, approval was given without discussion and, according to the head of the US delegation at the meeting, Frank Farance, the new amended document is likely to contain “hundreds of defects”.^[1] Other reports from delegates have characterised the meeting as “horrible, egregious, process abuse”^[2], and the resulting text as “though slightly better it is still abysmal”^[3], and have summarised the situation by stating “Draft ISO standard, ISO/IEC DIS 29500: Office Open XML (OOXML) specification for electronic document formats, had the majority of its technical issues still not addressed satisfactorily”.^[4]

Although improvements may have been made on the small number of issues that did get discussed, the 900 non-discussed issues risk introducing many new problems into the format specification. It is not certain if the suggested changes do indeed fix the problems, and it is not certain whether there are conflicts among the undiscussed changes. It is therefore almost certain that the draft still fails to reach the required quality level for an international standard.

Further, in these circumstances, it seems impossible that the Technical Comments could have been satisfactorily resolved and incorporated into the new draft. IFSO therefore urges the NSAI to maintain its “Disapprove” vote.

Yours sincerely,

Ben North
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References:

[1] Quoted in ComputerWorldUK.com, “Rubber-stamping of OOXML raises concerns”
<http://www.computerworlduk.com/management/infrastructure/applications/news/index.cfm?newsid=7769>

[2] Tim Bray, Canadian delegate, world XML expert
<http://www.tbray.org/ongoing/When/200x/2008/02/29/BRM-narrative>

[3] Antonis Christofides, Greek delegate
<http://elot.ece.ntua.gr/te48/ooxml/brm-clarifications>

[4] Malaysian official press release
<http://www.standardsmalaysia.gov.my/press%20release%204%20March%202008.pdf>