Overview: Google analysis of ECMA's "Disposition of Comments"on DIS 29500/OOXML

Background

On September 2nd 2007 the DIS 29500 (OOXML) ECMA proposed standard was rejected by a vote of National Bodies for consideration as an International Standard. Three thousand five hundred and twenty two comments were submitted by the National Bodies reviewing the six thousand five hundred and forty six pages of the proposed standard. As part of the fast-track process ECMA responded on January 14th 2008 with two thousand two hundred and ninety three pages of "Disposition of Comments" documents, many of which are duplicates, proposing changes to the specification in order to address the National Body comments.

Google is concerned that the ECMA responses to the National Body comments does not adequately address the issues with DIS 29500. Google respectfully requests that National Standards Bodies vote "no" on the adoption of DIS 29500 as an International Standard.

Although Google has analyzed all of the ECMA responses, we will not go over the individual comments and responses in detail in this overview document, as there are far too many to make this practical here. Instead we will review the three most important issues we have found with DIS 29500 and the ECMA "Disposition of Comments" and explain why we believe DIS 29500 does not reach the quality needed to become an International Standard.

An unnecessary standard

Many of the National Bodies comments referred to the fact that there is already an International Standard for office documents, ISO/IEC 26300 (ODF), and requested that ECMA harmonize the OOXML specification with ODF.

ECMA's response to this issue is essentially to claim this is not a problem. We do not feel this is addressing the core issue with DIS 29500, which is that it is an unnecessary standard. The overlap between DIS 29500 and the existing ISO/IEC IS 26300 (ODF) standard is so great that the needs of the DIS 29500 designers could easily have been met by adding the additional features requested to a future revision of ODF. The response states "*Harmonization would require functional changes to two International Standards and would fall under the JTC 1 procedures for new work within SC 34 and could be done in the future. Such work should not be done in this Fast-Track process and should not impede the adoption of DIS 29500.*"

Google fully agrees such work should not be done in this Fast-Track process. Google also submits that the appropriate response to additional functional demands in a standard is to make changes to the existing International Standard, as demonstrated in the evolution of many different successful standards, e.g. HTML. The increased functional demands for later versions of HTML were not achieved by the introduction of a second, mutually incompatible, document standard for the World Wide Web. Submitting such a proposal makes a mockery of the standards process.

An application specific "standard"

In reciting its declared design goal for DIS-29500, ECMA itself clarified that this has never been a serious attempt at an International Standard, but an enumeration into XML of the idiosyncrasies of the Microsoft Office application format. "*OpenXML was designed from the start to be capable of faithfully representing the pre-existing corpus of word-processing documents, presentations, and spreadsheets that are encoded in binary formats defined by Microsoft Corporation.*"[1]

Whilst the move from a proprietary format to a documented format by a vendor should be applauded, we do not believe its adoption as an International Standard to be in the interest of society, technology or standardization in general.

Many National Bodies have raised concerns about the application specific parts of DIS 29500. ECMA's response is to attempt to document these application specific features, and to move them into a new "deprecated" annex with the recommendation that they should not be used in new documents.

The addition of such deprecated features in an initial version of a standard is an obvious sign of errors in design. If the features are truly deprecated they should be deleted, which brings into question the fundamental goals of DIS 29500 in representing legacy documents. If DIS 29500 is meant to represent legacy documents the correct solution is to document the application behavior, which has now been attempted, and to provide mapping from the legacy behavior into the new standard. What should not be necessary is the ability to store the application specific behavior of legacy documents in a new International Standard. The fact that DIS 29500 provides this capability betrays its design as a way to maintain application specific capabilities in what is supposed to be an interoperable standard, implementable by anyone on any platform.

An insufficient standard

It is clear that DIS 29500 is still undergoing large changes and clarifications. National Bodies have raised issues about basic areas as: compatibility settings, password hashing, numbering formats, security features, calendar formats and many other areas, being unspecified in the DIS 29500 specification. ECMA has acknowledged these flaws in their responses.

However, ECMA's response to the overall question of whether DIS 29500 is a document of sufficient quality for International Standardization is to flatly deny that DIS 29500 is still under technical development. Google believes that DIS 29500 is still undergoing large numbers of changes which make it wholly unsuitable for consideration as an International Standard. The large number of issues raised with DIS 29500 which have needed to be addressed by ECMA are a warning that this specification was not in a suitable state for ISO standardization when submitted to the fast-track process. After reviewing ECMA's responses we still believe this to be the case.

Reviewing all comments

Finally, Google would remind interested parties that full review of all comments on a proposed standard is essential if the quality of the International Standards process is to be maintained. Google believes that if all comments are taken into account, National Standards Bodies and the International IT/IS technical community will agree that DIS 29500 is not of sufficient quality to be considered as an International Standard.

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1 From the ECMA whitepaper "Office Open XML Overview" at http://www.ecma-international.org/news/TC45_current_work/OpenXML%20White%20Paper.pdf), under "*Purposes for the Standard*"