Google's Position on OOXML as a Proposed ISO Standard

Introduction

Google is concerned about the potential adoption of Microsoft's Office Open XML (OOXML) format as an ISO standard. Google supports open standards and the Open Document Format (ODF), an existing ISO standard that has been a driver for innovation. We do not think it is beneficial to introduce an alternative standard when the Open Document Format already meets the common definitions of an open standard, has received ISO approval and is in wide use around the world. Google's concerns about OOXML include, but are not limited to:

- The limitations on the openness of OOXML format;
- The lack of proper review as compared to other ISO standards;
- The continued use of binary code tied to platform-specific features; and
- Unclear licensing terms for third-party implementers.

The following is a Q&A to help clarify Google's position on the ISO standardization of OOXML.

Aren't multiple document standards good? We have PDF and HTML, so why not ODF and OOXML?

Multiple standards are good, but only if they are designed to address different problems. HTML is a very simple mark-up language designed for rendering within browsers, while PDF is a display-only format designed for high-fidelity print output. ODF and OOXML are both designed as a format for editable documents. As such they both address the same problem and almost completely overlap. The current state of file formats for editable documents makes life very difficult for consumers and vendors of office productivity software, and is a looming disaster for long-term document storage. Having two mutually incompatible formats for editable documents will allow the current non-interoperable state of affairs to continue.

Microsoft has been arguing that OOXML is a good thing as it gives vendors and customers choice. Multiple incompatible standards are a bad thing for customer choice, as purchasers of Betamax video recorders discovered to their cost. Multiple implementations of a *single* standard are good for both the industry and for customers.

If Microsoft wishes to create a document format that is better able to address the problems of the many editable legacy documents created in their older proprietary formats Google welcomes them to help extend the existing ODF ISO standard, in order to add the capabilities they require. Allowing OOXML to become a parallel ISO standard will propagate the current legacy situation into what is supposed to be a solution to the problems of long-term document storage.

OOXML is a perfectly good ISO standard. Isn't this just complaining by other vendors?

In developing standards, as in other engineering processes, it is a bad idea to reinvent the wheel. The OOXML standard document is 6546 pages long. The ODF standard, which achieves the same goal, is only 867 pages. The reason for this is that ODF references other existing ISO standards for such things as date specifications, math formula markup and many other needs of an office document format standard. OOXML invents its own versions of these existing standards, which is unnecessary and complicates the final standard.

If ISO were to give OOXML with its 6546 pages the same level of review that other standards have seen, it would take 18 years (6576 days for 6546 pages) to achieve comparable levels of review to the existing ODF standard (871 days for 867 pages) which achieves the same purpose and is thus a good comparison.

Considering that OOXML has only received about 5.5% of the review that comparable standards have undergone, reports about inconsistencies, contradictions and missing information are hardly surprising.

Isn't this standard needed to support the millions of existing Microsoft Office documents?

OOXML is a brand new format, different from the existing .DOC, .XLS and .PPT formats that are widely used by Microsoft Office. In order to move to an XML-based format these documents will have to be translated anyway. There is no wide use of OOXML format documents on the Web. Counting the number of documents found by doing Web searches for different document types the older Microsoft Office formats dominate, but the second most widely used format is the existing ISO standard ODF. As translation is needed anyway it would make more sense to convert to ODF, the existing ISO standard for editable document types.

In addition, if OOXML were necessary to faithfully convert these legacy documents to an XML format, it would have to contain the complete specification of these older document formats. Without this OOXML would be incomplete in its descriptions for an ISO standard. No specifications for older document formats exist in the OOXML descriptions, and so any argument that OOXML is needed for their accurate translation is false. Such legacy documents may just as easily be translated to ODF (as can be seen in the way some existing ODF implementations handle the import of the legacy Microsoft Office file formats).

Doesn't OOXML already have wide industry adoption?

Many companies have announced they will support OOXML, and several have announced translators for the new formats. This is only to be expected, as Microsoft is a major vendor in the office automation space. Wide industry support doesn't necessarily make a good ISO standard, although it definitely helps. What matters more for a good interoperable standard is multiple implementations. On this score ODF is very well served, with around twelve different implementations of software that can read and write ODF files. Most of the OOXML implementations are from partners of Microsoft who have contractual agreements to implement OOXML software.

Multiple independent implementations help a standard mature quicker and become more useful to its users. It fosters a range of software choices under different licensing models that allow products to be created and chosen whilst still faithfully adhering to the ISO standard.

Isn't OOXML safe to implement by anyone?

NB. This section is not legal advice from Google. For a full analysis of the OOXML licensing conditions, please consult a lawyer.

Microsoft has offered an Open Specification Promise covering OOXML which they claim would cover third party implementations of the standard. See http://www.microsoft.com/interop/osp/default.mspx. There is considerable legal uncertainty around the scope of this promise, which appears only to cover the exact version of the specification currently published, but not any future revisions or enhancements. The legal uncertainty surrounding the scope of this license grant weighs heavily against the propriety of ISO acceptance of the OOXML standard. The existing ODF ISO standard is covered by Sun's "OpenDocument Patent Statement," which does not suffer from these issues. See http://www.oasis-open.org/committees/office/ipr.php.