

Google analysis of ECMA's “Disposition of Comments for the Czech Republic”

Google's position

Google is concerned that the ECMA responses to the Czech Republic 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.

Review of ECMA responses to Czech Republic comments

CZ-0001

The ECMA 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.*” We fully agree such work should not be done in this Fast-Track process, and would prefer to make functional changes to one existing International Standard. On this basis alone, we feel DIS 29500 should be rejected.

Examining DIS 29500 it becomes clear this is not a serious attempt at an International Standard, but more of the enumeration into XML of the idiosyncrasies of one particular application format, Microsoft Office. Whilst the move to a documented format should be applauded, adopting it as an International Standard is a terrible mistake which will have serious repercussions for many years to come.

CZ-0004 / CZ-0011 / CZ-0014 – CZ-0024

The addition of 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 that 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 flawed behavior of legacy documents in a new International Standard. The fact that DIS 29500 provides this capability (for example the use of VML, allowing the storage of Windows specific implementation details such as “autoSpaceLikeWord95”, Windows metafiles or Windows printer DEVMODE structures) betrays its design as a way to maintain application specific capabilities in what is supposed to be an inter-operable standard, implementable by anyone on any platform.

If all existing documents are to be seamlessly mapped into the new format, maintaining all bugs from the previous format, there is very little reason for the new standard to exist at all. It appears to be an attempt to standardize the bugs and idiosyncrasies of previous implementations. When reading legacy documents and writing them out into a new format, mapping should be done to remove the errors of

previous implementations. If this mapping is an identity, then DIS-29500 is not a new format, but merely an XML-dump of the existing binary formats. We have no problem with this as a concept for a new format, but it is not suitable to be declared an ISO standard.

CZ-0006

The resolution is flawed. There is no explanation as to why keeping the legacy language codes is required for compatibility with older documents. There should be no need for DIS 29500 supporting applications to ever store a legacy language code. Applications that read legacy formats should do the mapping into an RFC4646 code (which is based on ISO 639) when reading such files.

CZ-0008 – CZ-0009

There is no explanation as to why keeping the flawed date system is required for compatibility with older documents. On conversion to DIS 29500 from older formats ISO 8601 dates can be used. Propagating mistakes made in legacy code should not be a purpose of an International Standard.

A counter proposal for dealing with dates in DIS 29500 may be found here :

<http://elot.ece.ntua.gr/te48/ooxml/disposition-on-dates>

This appears to be a far superior way of dealing with legacy dates than keeping the flawed format.

CZ-0013

The correct response to the problem of Web browser platform dependency is not to enumerate a list of platform specific Web browsers and the feature sets they support, which this change attempts to do. Such a list is a fundamentally flawed proposition in a standards document and doomed to be hopelessly out of date even before adoption. Either a mapping between OOXML features and standard HTML should be included, or references to Web display should be removed. Converting between XML document standards and Web display is an application specific feature upon which applications should compete.

The fact that this is seriously suggested as a solution in a standards document leads us to question the applicability of DIS 29500 to be considered as an International Standard.

CZ-0037

“PictOld” is a flawed concept. Existing standards for picture files should be used in conversion of old documents.

Conclusion

Examining DIS 29500 it becomes clear this is not a serious attempt at an International Standard, but more of the enumeration into XML of the idiosyncrasies of one particular application format, Microsoft Office. Whilst the move to a documented format should be applauded, adopting it as an International Standard is a terrible mistake which will have serious repercussions for many years to come.

Reviewing other comments

Finally, Google would like to request that each National Standard body examine the ECMA responses to all comments made by other bodies, not just the responses to their own comments. Full review of all comments on a standard is essential if the quality of the International Standards process is to be maintained. Google believes if all comments are taken into account, National Standards bodies will agree that DIS 29500 is not of sufficient quality to be considered as an International Standard.