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## Contradictions to ECMA-376 fast track process at ISO/IEC

Dear Member of the ISO/IEC national standardization bodies,

*"To date, the industry has not served you well when it comes to the office application market. You do not have unconditional control and ownership of your own documents now and into the future. Open Document Format (ODF) addresses these issues by standardizing the file formats so that anyone can use them, anyone can implement them on any platform at any time, and no license or fee is required. This gives you complete control and ownership of your documents, forever. ODF creates an ecosystem, already supported by over 50 organizations, that allows more vendors, more innovations, more office suites, and more variations in office suites leading to more choice for users. ODF enables choice among an unlimited number of interoperable applications."*

This text belongs to the official "Comment to the 'YES' vote of MSZT", the Hungarian standardization body on May, 1<sup>st</sup> 2005, to ISO 26300, OpenDocument or ODF, the open standard format for office documents most widely implemented among the software industry along the history, the one being adopted everyday by more and more public administrations worldwide, and the only existing international standard for office applications. Its specifications can be obtained and fully implemented for free and are composed of **just 600 pages** of documentation.

But, far from that last year events, until February 5<sup>th</sup> an ISO decision has to be taken about whether to pass another document format by "*fast track*", promoted by a dominant market player via the ECMA industry association. Exactly we are concerned about the ECMA-376 specification, originally called MS-Office Open XML, because it suffers at least from the following important issues:

- **An ISO standard must not be developed by a single company** as has happened with ECMA-376. This is clearly stated in the target of the ECMA TC45: "*At the General Assembly meeting on 8 December 2005, Ecma International has created Technical Committee 45 (TC45) to produce a formal standard for office productivity applications that is fully compatible with the Office Open XML Formats, submitted by Microsoft.*"[12]
  1. A specification with **more than 6000 pages** [1] covering practically the same functionality as the one of ODF, makes it unaffordable for competitors to create 100% compatible implementations. Additionally, the specification is not complete, including multiple references to Microsoft's internal and non public data [2].
  2. **Only single application** is actually expected to implement ECMA-376 and it is **not**

**commercialized yet.** Additionally, this application is one of the most expensive in the market and only works on one platform (MS-Windows). Users of other platforms as Symbian, MacOS, Linux and BSDs are being discriminated by this format.

3. Standard **maintenance is done by a single company:** Microsoft Corporation.
  4. In the ECMA committee that released ECMA-376 **only worked four actual ECMA members** [8], while another member, IBM, refused its approval [10].
  5. Microsoft can, in any moment, close the documents coded under ECMA-376 format, through the **DRM restriction features implemented** [11] in Windows Vista and MS-Office 12, that in this way can be tied to a single combination of platform and office suite.
  6. There exists **no any legal security** using or implementing ECMA-376 [6], since the holders of patents and other exclusive rights do not provide complete warranty that the specification can be fully implemented safely any time, anywhere and unconditionally.
- Regarding the format itself:
    1. ECMA-376 has a single year of development against five of ODF, and it is a format that has **demonstrated no any validity** in productive environment. Indeed, it codified expressibly well known errors [5].
    2. ECMA-376 is **not 100% XML** and locks-in to specific platforms from one particular provider, via the use of exceptions and exclusive binary codifications[7]. This scenario would infringe the WTO Agreement on Technical Barriers to Trade.
    3. A **cryptic XML coding** [8], closer to a computer memory dump of binary structured data than to a document of unstructured and human nature (as XML of ODF does and usually all other XML formats provide), makes the code of the document quite difficult to read for a person, or indeed a programmer, and, what is worse, practically makes the conversion to/from other standard formats as XHTML, ISO 26300 and DocBook almost impossible.
  - During the short one month contradiction period to accept fast track, **a lot of contradictions** [3] and objections [4] have been raised by independent sources that should be studied in detail by ISO/IEC subcommittees and national mirror subcommittees. Further, potential issues could be addressed if a non-fast track process is followed.

Taking all this in care and considering that no user experience is improved at all with the proposed standard:

1. **FFII urges to reject the fast track process of ECMA-376 by raising contradictions to its standardization.**
2. **As European Commission has asked for, “one only standard for office documents”, FFII urges ISO members to merge ECMA-376 with the existing office documents standard, ISO 26300, instead of creating a parallel, not fully open, and incompatible standard (ISO 29500), as is pretended by this fast track process.**

We would feel much obliged if you take our demands in consideration.

Yours sincerely,

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[7] Rob Weir, "To hire Guillaume Portes", 3 January 2007

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### About the FFII

The FFII is a not-for-profit association registered in twenty European countries, dedicated to the development of information goods for the public benefit, based on copyright, free competition, open standards. More than 850 members, 3,500 companies and 100,000 supporters have entrusted the FFII to act as their voice in public policy questions concerning exclusion rights (intellectual property) in data processing.