

From: [Donna Gilmour](#)
To: [Standards \(ITD\);](#)
CC:
Subject: NEW POLICY
Date: Monday, July 23, 2007 11:49:56 AM
Attachments:

I read a news story about the new policy on document formats and I think you're doing the right thing. In the end you want the greatest number of choices for government agencies so that they can pick the best format and software for individual needs. The new policy seems to outline reasonable goals in terms of archiving and competition without specifying a single format and that certainly seems to be an improvement from the previous policy of essentially picking a single winner. Those of us who lived through the big dig know that picking winners makes Mass citizens losers.

From: [ITDWeb](#)
To: [standards at state.ma.us.](mailto:standards@state.ma.us)
CC:
Subject: FW: ITD Website Feedback
Date: Monday, July 23, 2007 7:51:50 AM
Attachments:

This email was received on July 20.

Paula Scudieri
Mass.Gov Office
617-626-4508

-----Original Message-----

From: apache at w1.mass.gov [[mailto:apache at w1.mass.gov](mailto:apache@w1.mass.gov)] On Behalf Of Work, Web (ITD)
Sent: Friday, July 20, 2007 5:16 PM
To: ITDWeb (ITD)
Subject: ITD Website Feedback

This Request was generated at: Fri Jul 20 17:16:01 EDT 2007

Visitor Contact Info

Name : Commenting on Enterprise Technical Reference Model v. 4.0
Email : No email due to spam back from Windows computers at your offices (don't know your security)
Phone : n/a

Subject : Please forward to party that is reviewing public commets about: Enterprise Technical Reference Model v. 4.0

Comments : Due to lack of a web form... for the comments - Please forward these to the party at the ITD that is accepting them.

See: Questions for Microsoft on open formats

<http://news.bbc.co.uk/1/hi/technology/6291124.stm>

tribute an application that uses this standard? 2. Under what conditions can I use this standard? For ODF and PDF the answers are, respectively, Noone (1) and some conditions on the use of the name PDF (2). How is this for EOOXML? Microsoft has written the standard and currently has the only working implementation of EOOXML. Therefore, MS are the only ones who know what copyrights and patents must be licensed from MS and third parties to implement EOOXML. But as of January 2007, Microsoft have consistently refused to identify the copyrights and patents that must be licensed to implement EOOXML. The language used by MS in the EOOXML licenses and "covenants not to sue" is so intricate (and peculiar), that many people still doubt whether it really allows anyone but Microsoft to implement EOOXML. Microsoft has changed the licenses for EOOXML during the years. The initial offer for licensing was seriously flawed as of March 2005. In December 2005, there were still major worries about the pledges not to sue by Microsoft and the ECMA terms of reference. But as late as the start of 2007 there were still doubts whether it would be legal to implement the standard in a meaningful way. To quote the conclusion of Analyzing the Microsoft Office Open XML License: In this way, the License is stated and is to be perceived as a threat rather than a promise. In effect it says 'Stay away! Microsoft is the only entity which may implement the Microsoft Office Open XML formats!' This is a fundamental contradiction of the purpose of an open standard. In the comments section of this blog, Marbux remarks that the peculiar language chosen for the EOOXML license makes him conclude that But as a legal foundation for building apps that can take thousands of person-hours, this covenant not to sue is legal quicksand of unknown depth. Or, as Andy Updegrave puts it: And taking that concern a step further, consider the fact that OOXML also apparently violates section 2.14 of the ISO/IEC Directives, Part 1, in that not all of what it takes to implement OOXML appears to be covered by Microsoft's patent pledge, in two respects. First, the pledge does not explicitly cover material that is referenced, but not included in the specification, and second, the Microsoft patent commitment does not cover optional features. Sections of OOXML that are not fully described include those that require compliant implementations to mimic the behavior of Microsoft products, such as those products and capabilities referred to above (OLE, etc.) Microsoft will need to clarify whether its patent commitment will in fact extend to these requirements. Potentially, these concerns would involve large portions of OOXML, in contradiction of the ISO/IEC requirement that more than a bare-bones implementation must be permitted without fear of infringement. Most of this is also discussed in Searching for Openness in Microsoft's OOXML and Finding Contradictions and the GL EOOXML objections project page. There is also a Microsoft commissioned evaluation of the license by Baker and Mackenzie from 2006. See, eg, these discussions on GL and the Grokdoc Talk:Objections page. Basically, the Baker and Mackenzie does not address any of the criticisms leveled against the two licenses: Covenant Not to Sue (CNS) and the Open Standards Patent (OSP) license. The report has some careful choice of words, but nowhere does it state that a blanket patent license is given for implementing the EOOXML specifications in full.

This all can lead to rather comical dialogs with MS legal representatives as was exemplified in this OpenMalaysia blog Billions of Documents. At a SIRIM TC4 meeting on ECMA 376, Microsoft was represented by Stephen Mutkoski (a lawyer). A member of the technical committee asks a simple question: They sent a lawyer to a Technical Committee briefing. Okay, perhaps we could get more legal information then. ... So if Macros are not included in Ecma 376, will developers who develop it independently get sued? I will have to get back to you ... To summarize the licensing problems, the answers to the above questions for your future EOOXML compliant software can be provisionally given as: 1. Microsoft can stop any attempt to distribute your application 2. You need permission from Microsoft for every application of EOOXML on a computer [edit] (In-)Compatibility with other standards MS wants its own XML format to be an ISO standard. However, MS' format does not conform to many other ISO or W3C standards. You might even think MS doesn't like the W3C ;-): See eg, Wikipedia, OpenDocument Fellowship, Open Malaysia: MSOOXML's disregard for existing standards and, of course, Bob Sutor's blog. See also this GL discussion: Again from the newspick: a description of why ODF and OOXML don't interoperate. Office Open XML unquestionably duplicates or at least significantly overlaps with the ODF specification; moreover, unlike Office Open XML, OpenDocument incorporates still other standards such as XPath, XLinks, SVG, XForms, and MathML. Office Open XML reinvents the wheel at every turn rather than relying on existing open standards. The failure to implement XPath in Office Open XML is particularly problematic; it makes full fidelity in automated XSL transformations to and from other XML formats next to impossible. That problem creates a contradiction in the ISO sense; full interoperability between ODF and EOOXML applications is infeasible. According to the Wikipedia XPath is the following: XPath (XML Path Language) is an expression language for addressing portions of an XML document, or for computing values (strings, numbers, or boolean values) based on the content of an XML document. The XPath language is based on a tree representation of the XML document, and provides the ability to navigate around the tree, selecting nodes by a variety of criteria. In popular use (though not in the official specification), an XPath expression is often referred to simply as an XPath. Originally motivated by a desire to provide a common syntax and behavior model between XPointer and XSLT, XPath has rapidly been adopted by developers as a small query language. I gather that if OOXML do not implement XPath, then documents in this format cannot be queried using normal XML tools. For example Wikipedia says the following on XSLT. XSLT is a specific kind of template processor primarily designed to "transform" XML documents into other XML documents. The original document is not changed; rather, a new document is created based on the content of an existing one.[3] The new document may be serialized (output) by the processor in standard XML syntax or in another format, such as HTML or plain text.[4] XSLT is most often used to convert data between different XML schemas or to convert XML data into HTML or XHTML documents for web pages, or into an intermediate XML format that can be converted to PDF document

[snip] XSLT relies upon the W3C's XPath language for identifying subsets of the source document tree, as well as for performing calculations. XPath also provides a range of functions, which XSLT itself further augments. This reliance upon XPath adds a great deal of power and flexibility to XSLT. What strikes me of such tactics is they are borderline on misrepresentation. When a supplier says he is using XML, most IT managers will understand a reasonably complete suite of XML related standards will be used to generate the full benefits of XML. By silently picking and choosing which standards in the XML suite they implement, Microsoft breaks this assumption without informing its customers. Open Malaysia has a very nice writeup on the VML (non-) deprecation in MS EOOXML Is VML in or out now, or was that a typo?. So: * 1. VML is included for backwards compatibility reasons only. * 2. DrawingML is newer and richer and designed to replace VML. * 3. VML is deprecated and only included for legacy reasons * 4. New applications are strongly encouraged to use DrawingML instead This simply begs these questions: * 1. Why then is Section 2.3.1 explicitly using VML? * 2. Where are the instructions for using DrawingML instead? * 3. If DrawingML is richer and designed to replace VML, why have VML in the first place? * 4. I would take it that Office 2007 is a "new application" and should use DrawingML instead of VML. Does it? What is extra interesting is the long first comment from Stephane Rodriguez who explains that VML was implemented to lock the internet, IE, to MS Office. So the Office team at Microsoft could not manage to get rid of VML. It is possible, unless they intentionally use it as a lock-in tool, that next version of Office, codenamed Office 14, will be the first one to have an Office-wide DrawingML implementation. Until then, Office 2007 is at odds with the specs that Microsoft is pushing and as a result, it is not a reference implementation of the specs! In other words, since there cannot be a non-Microsoft implementation of the specs (it will take at least ten years for a company starting now, and it will never achieve 100% fidelity since many things are missing in the specs), it follows that there is simply NO reference implementation out there! Quite amazing... Standards flouted in MS EOOXML (see also Rob Weir's ooocon2006 presentation and Andy Updegrove's The Contradictory State of OOXML): * Codes for the Representation of Names and Languages ISO 639 * Computer Graphics Metafile ISO/IEC 8632 * XLink W3C * XForms W3C * XPath W3C * SVG W3C * MathML W3C * SMIL W3C * Gregorian Calendar ISO 8601 (EOOXML redefines leap years and uses two start dates for counting, 1900 and 1904, see also Brian Jones' apology blaming the bug on a programming shortcut in Lotus 1-2-3.) The 1900 leap year bug is an excellent illustration of how Microsoft treats standards as documentation of their code binaries, including all legacy bugs. Other links * The Future of Lock-in * Game Time for OpenDocument * Searching for Openness in Microsoft's OOXML and Finding Contradictions * Deadline Looms to Express Concerns about ECMA 376 Office Open XML * Standardizing away the world's languages * Cum mortuis in lingua mortua (SVG/VML) * OOXML has poor XML Element names [edit] Office2007 implementation At the start of 2007, only Office 2007 implements EOOXML. However, it is reported that

Office2007 does prefer a binary format after all. Allegedly, for performance reasons. This GL comment says it all (see also this continuation) Checking the Rob Weir blog I notice that MS Office 2007 is not using OOXML after all. There is yet another binary format that is silently introduced and touted as the preferred option. Rob Weir says: It is also interesting that Microsoft is positioning this format as the preferred one for performance and interoperability. The online help for Excel 2007 says: In addition to the new XML-based file formats, Office Excel 2007 also introduces a binary version of the segmented compressed file format for large or complex workbooks. This file format, the Office Excel 2007 Binary (or BIFF12) file format (.xls), can be used for optimal performance and backward compatibility. The Gary Edwards blog (from the newspick) posted another finding of Rob Weir that I wasn't able to locate on his blog. Another interesting point, courtesy of the inexhaustible Rob Weir, is that MSOffice 2007 has the unique ability to produce two kinds of EooXML. I've never seen an application do this before, and one has to wonder why? What Rob discovered is that if you import a legacy BoB into MSOffice 2007, the application will convert it to EooXML fully preserving the originating application binary encodings \u2013 even doing so within laughably and descriptively colorful named XML tags. Fine. We can easily do that with ODF using the infamous tag model. No inadequacy to be found here. (Damn, if only we had patented that technique. Phil Boutros must be lapping this up :) One of the examples Rob pointed out is the use of the long since deprecated VRM encoding. Good work MSOffice 2007! Next Rob re-created that same legacy document \u201cnatively\u201d in MSOffice 2007. Exactly the same! Saved it as EooXML. Then examined the XML, comparing the two EooXML files. Well well well. They are substantially different! Same application. Same file format. Same document content and presentation. Different EooXML! Interestingly, for one thing there is no VRM encoding. It's been replaced by the proprietary application/platform dependent but forward Vista ready DrawingML. Some will argue that this is the only way to preserve backward compatibility. I would argue that this will result in an information nightmare. Only one of the EooXML files is backwards compatible. The other is ready for the Vista bound information processing chain centered on the Exchange/SharePoint Hub. How are organizations going to keep things straight? How can someone interoperate with Office 2007? People will have to sort out which of the ever changing file format is being produced. ISO standardisation looks pretty much like a decoy. It can be used (if at all) to send information in the MS Office suite but it will never get out. Governments that want standards for sovereignty purposes will get a "standard" but not the sovereignty. Here is Bob Sutor's opinion from We have proprietary extensions to Microsoft Office Open XML already. Here\u2019s an idea of how things are already reverting to the same old behavior, right when Microsoft is trying to convince the ISO how wonderful for interoperability their spec is supposed to be. One point being made in several places, eg, in MS Office 2007 is not using OOXML, is that Visual Basic macros in Excel (VBA) are stored in a binary (unreadable) form in EOOXML (they are not described in the standard). That is, the ASCII VB macros cannot be exported to another

application using EOOXML. An anonymous comment in this blog claims that VBA macros are Excel internal and have no use outside. But other applications are implementing VB too, so that argument is incorrect. To summarize, MS warn users to not use EOOXML to store a large spreadsheet because of bad performance and that EOOXML cannot represent all information in Excel2007. These posts also suggest that a lot of the attacks on ODF, eg, bad performance on large spreadsheets (and here) and inability to represent all of MS Office features, were pre-emptive strikes to divert from the shortcomings of EOOXML itself. (and some find OO.o is faster than MS Office)

[edit] Alternative Implementations As far as I know, this might be the first ISO standard that fully implements just a single product of such horrible complexity (running over 6000 pages). It costs MS themselves an estimated 150 work years to implement their own standard. However, this was later qualified by Andrew Shebanow after a response from Rick Schaut with a different set of statistics. But even after all numbers juggling, it is still not clear whether other groups can implement the exact same product, and if they can, how much time this will take. According to How to hire Guillaume Portes by Rob Weir, it is clear that Microsoft withholds essential information to fully implement EOOXML. For a more comprehensive comparison between EOOXML and ODF, see ODF/OOXML technical white paper. 'Rumours' have it that MS EOOXML is just a serialized, packaged memory dump of the internal Office data structures. As Rob Weir puts it: The astute reader will notice that this is pretty much a bit-for-bit dump of the Windows SDK memory structure. In this case the file format specification provides no abstraction or generalization. It merely is a memory dump of a Windows data structure. Bill Hilf has meanwhile confirmed these rumours as reported by the Open Malaysia blog. A good standard does contain features that help converting documents from legacy products. But it does not require a reimplementations in the standard of all legacy formats. A good illustration how far removed EOOXML is from a real standard is given in the above mentioned How to hire Guillaume Portes by Rob Weir. A choice quote from Rob Weir, after reproducing the requirements for Word 95's spacing compatibility "between full-width East Asian characters in a document's content": What should we make of that? Not only must an interoperable OOXML application support Word 12's style of spacing, but it must also support a different way of doing it in Word 95. And by the way, Microsoft is not going to tell you how it was done in Word 95, even though they are the only ones in a position to do so. This aspect of EOOXML is consistent with the fact that MS EOOXML seems to be a memory dump of Office internal data structures. It can be imagined that MS Office stores it's own formatting information in internal data structures, but uses hooks into legacy code, bugs included, to generate older formats. Legacy formats Microsoft might not know how to recreate themselves anymore. So when dumping it's internal data to file, it inserts these hooks into the XML to refer to these legacy code fragments. How anyone without these legacy code fragments could re-implement their behavior is beyond my comprehension. Maybe someone can enlighten me about this. In his blog, Brian Jones answers some of the points of Rob Weir and accuses ODF from

having unspecified elements too. But read the comments on his blog about what questions Brian does not answer (and never answers, see this GL post). Brian Jones seem to confuse unspecified formatting elements in EOOXML that affect the layout of the document with unspecified application internal settings, eg, menu bar placement, in ODF. It is clear that the latter are not intended to be portable. Moreover, Brian Jones seems to confuse OpenOffice.org with the ODF standard. For instance, when he complains that OpenOffice.org has a config setting indicating legacy line-spacing. But this config setting is definitely not part of the ODF standard. Rob Weir discusses the lack of distance between OOXML and MS Office 2007 in Essential and Accidental in Standards where he concludes: It seems to me is that OOXML in fact does have application-dependent behaviors, but only for Microsoft Office, and that Microsoft has hard-coded these application-dependent behaviors into the XML schema, without tolerance or allowance for any other implementations settings. Something does not cease to be application-dependent just because you write it down. It ceases to be application-dependent only when you generalize it and accommodate the needs of more than one application. The inclusion of application config settings into the document standard on an equal footing strengthens the picture that projects EOOXML as a semi-automatic dump of the internal data structures of MS Office 2007. (on a personal note, it find it revealing that a very experienced MS developer like Brian Jones confuses a standard with the config options of an application) In short, EOOXML contains a lot of distinct legacy formats. This point is made very clearly in another of Rob Weir's blog posts Calling Captain Kirk: The OOXML specification, at 6,000+ pages has now just sucked in the complexity of one or more versions of HTML, MHTML, RTF and WordProcessingML. It requires that a conformant application understand these formats, but forbids a conformant application from producing them. This is another example of how you never know what you're getting when you get an OOXML file. To support OOXML is not to support a single format, or even a single family of formats. To fully support OOXML requires that you support OOXML plus a motley hodgepodge of various other formats, deprecated, abandoned and proprietary. The cost of compatibility with billions of legacy Microsoft documents is that you must support their legacy of years of false starts and restarts in the file format arena. Also Andy Updegrave's blog post The Contradictory State of OOXML refers to these proprietary legacy components in EOOXML: Other parts of OOXML refer to OLE, macros/scripts, encryption and DRM \u2013 none of which are fully described. Nor has Microsoft stated whether necessary information will be supplied on a non-discriminatory basis to all (or at all). Stephane Rodriguess explains in a comment to Open Malaysia how the OLE in MS EOOXML is platform bound There is a reason why Microsoft does not document this stuff. They would have to give the documentation of OLE, which in turn would show clearly as in water that this stuff is platform-dependent : Windows. At some point, MS started to drum op "Representation" as the basic value of MS EOOXML, see Rob Weir's No representation without specification. This representation thing can be summarized as EOOXML is like a street

directory without a map. It represents each address, but won't help you to find it. At this point, I am starting to seriously doubt whether even Microsoft could reimplement EOOXML from scratch."

Added:

<http://www.groklaw.net/article.php?story=20070720073215943>

We want control of Documents - and not to be controlled by Microsoft. Sovereign status of a state or commonwealth must be a priority...! Read below and understand how this affects MA and individuals.

"Finally, I want to control my own documents. I wrote them, and I wish to control them. This is the part I hope Massachusetts thinks about carefully. An important goal of government is to preserve documents so they don't become inaccessible to the public. Proprietary extensions by definition slam that door in your face, because you then lose control over your own documents. You can never have access now except through Microsoft, and if you think that company is going to be around in fifty or 100 years, you need to ask: are you positive? Can you guarantee it? And even if they are, whose documents are they now? Yours? Or Microsoft's? Who controls access?

If your goal is to avoid lock-in to a single vendor, then proprietary extensions should scare you silly. It doesn't matter then how many companies use the format or how many business partners want it or even if it is a de facto standard -- you are now dependent on one single vendor. That unhappy fate is precisely what ODF, and only ODF, can prevent. So, why not just bite the bullet, merge ODF with Ecma-376, and make it possible for everyone to interoperate freely as we already can in email? I can send an email to my friends from my Linux computer or my Mac and they can still read it just fine, even if they do use Windows and love HTML email. I remember Eric Kriss told ComputerWorld why not:

He said technical people at Microsoft told him it would be "trivial" to add support for ODF to the new Office 2007. The resistance to doing so came from the vendor's business side, according to Kriss...."

So - Microsoft thinks that ODF and "Open Standards" are NOT agreeable to their business plan.

If you notice the dance that Microsoft is doing all over the world... it is to exclude and destroy any open standard that everyone can use (as it not in the best interest of Microsoft's balance sheet to have an open solution)!

See the following articles and the comments that follow as well:

* Proprietizing Standards, 10:25 AM <http://www.groklaw.net/article.php?story=20070720073215943>

* Notes from Portugal on the July 16th Meeting on Ecma-376, Wednesday 05:18 PM
<http://www.groklaw.net/article.php?story=2007071812280798>

Thank-you!

From: [donald kulinski](#)
To: [Standards \(ITD\);](#)
CC:
Subject: open xml 07-23-2007
Date: Monday, July 23, 2007 1:33:06 AM
Attachments:

recently received information about the microsoft system programs of xml format being used by the state gov't of mass. and the idea does increase the understanding of technology and the innovation of such products and programs to be given to the people of the u.s. to be used,, like the thoughts of waldon pond,,free thought cannot be denied and of the meaning and intent of the word ,,domain,,when used to benefit the ,"people", as a common goal.

thank you for your time
donald kulinski

From: [Don Casteel](#)
To: [Standards \(ITD\);](#)
CC:
Subject: campaigns at fsf.org
Date: Sunday, July 22, 2007 8:21:42 PM
Attachments:

In response to the article <http://www.fsf.org/blogs/community/ooxml-is-not-open>

I would like to express my opinion that in any area that the U.S. government has the opportunity to utilize non-proprietary, freely available, goods, services, products, and technologies, it is not only in the public interest, but the ethical and responsible thing to do.

There is a fundamental responsibility to maintain a separation of corporation and state. As soon as public records become only available in a proprietary format, there is a potential for conflict of interest and antitrust issues.

This may seem like a small issue starting out, but consider the future cost to the American people, of having to reformat records and archives should it be determined that forcing citizens to purchase private software to use or access public documents is unconstitutional.

Keeping all public records in an open format is the most responsible action any government agency can take.

Don Casteel

My Deviant Art Home: <http://casteeld.deviantart.com>
My Deviant Art Gallery: <http://casteeld.deviantart.com/gallery/>
My Project Home: <https://fractrace.dev.java.net/>

Ready for the edge of your seat? [Check out tonight's top picks](#) on Yahoo! TV.

From: [Brylie 0](#)
To: [Standards \(ITD\);](#)
CC:
Subject: No OOXML. Yes ODF.
Date: Saturday, July 21, 2007 3:38:32 PM
Attachments:

Dear Standards Committee,
OOXML is an attempt to impose a standard on the public by abusing an overwhelming market share and the ignorance of users.

Open Source and community developed applications have had to struggle every inch of the way [sometimes at the risk of 'patent infringement' although said patents have not yet been disclosed] in order for their applications to be able to cross communicate with their proprietary counterparts. At the same time, the proprietary software vendors have traditionally ignored open standards and only with increased governmental decisions to embrace open and portable standards do the aforementioned vendors decide to provide an iota of cooperation. This cooperation comes only on 'their' [proprietary vendors] terms and in hastily developed fashion.

By simply embracing the work of those who have gone before and who have already crossed many bridges in designing an open and community based standards, companies and governments can promote cooperation and the 'de-babelization' of our communications and documentation infrastructure.

Thanks,
-Brylie

P.S. Sorry this submission is after the deadline. I did not find out about the public commenting option until today [2007.07.21].

From: [mnichols at mojosoft.org](mailto:mnichols@mojosoft.org)
To: [Standards \(ITD\);](#)
CC:
Subject: OOXML
Date: Saturday, July 21, 2007 9:13:49 AM
Attachments:

Perhaps instead of suing Microsoft for anti-trust violations you could simply stop giving them the upper hand. OOXML feeds right into the desire to break XML and document interoperability. You will be giving them the moving target they need to keep their strangle hold on the industry.

Sincerely,

Mojo Nichols

From: [Stephen Hockema](#)
To: [Standards \(ITD\);](#)
CC: [Jutta Treviranus;](#)
Subject: Public Comments on ETRM v. 4.0
Date: Saturday, July 21, 2007 12:01:02 AM
Attachments: [OOXMLInaccessibility.odt](#)
[OOXMLInaccessibility.pdf](#)

Dear Ms. Pepoli and members of the Information Technology Division,

We are writing to you as representatives of the Adaptive Technology Resource Centre (ATRC) at the University of Toronto (<http://www.atrc.utoronto.ca>).

It has come to our attention that you are accepting public commentary on a proposed draft of version 4 of the Enterprise Technical Reference Model. We are writing to respectfully urge you to reconsider a particular aspect of this draft: specifically, the inclusion of Office Open XML (OOXML) as an accepted document standard.

Before doing so though, we want to first applaud you for your recent move towards open document standards. This is a worthy goal and we were very happy with the precedent you set last year. We urge caution though that, just because the adoption of one open standard is a good thing does not necessarily mean that the adoption of another competing open standard is a positive step as well.

While we have many general and specific objections to OOXML, we will confine our remarks to our particular area of expertise, the accessibility of this format to people with disabilities.

Hence, although we are not residents of the Commonwealth of Massachusetts, we feel obligated to write on behalf of people there with disabilities who, we believe, will be severely disadvantaged by the proposed change. Furthermore, we believe that the change, if adopted, would set a precedent that could have significant detrimental ramifications outside of Massachusetts as well.

Because accessibility issues are in-depth and often require extended technical explanation, we are attaching a white paper on which we are beginning to work that attempts to explain problems we have found in the OOXML standard. We apologize that this paper is still in draft form.

To summarize the points in the paper, the OOXML document format is designed in such a way that it will be impossible to develop technologies to assist persons with certain common disabilities in accessing the content. In particular, a key finding is that documents composed in OOXML that contain Forms or Tables will not be electronically accessible; nor will presentation slides. Given the importance of such documents to government and educational materials, we hope you will agree that such a situation would be untenable!

If you would like clarification on these comments our our white paper, please do not hesitate to contact us.
Sincerely,

Jutta Treviranus
ATRC Director and Sr. Research Associate of the Faculty of
Information Studies
University of Toronto

Stephen A. Hockema
Assistant Professor in the Faculty of Information Studies and ATRC
affiliate
University of Toronto

P.S. We have attached the paper in two formats for your convenience. The content of the two files should be identical.

From: [jose lorenzo](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Second email concerning the potential to eventually recognize OOXML as an open standard alongside ODF and PDF
Date: Friday, July 20, 2007 11:33:46 PM
Attachments:

To whom it may concern:

On July 17th I submitted some comments expressing the view that OOXML is not in a form ready to be recognized as a true open standard. My opinion was that to accept OOXML as an open standard would not benefit the majority of the state agencies, of those doing business with the state, or of the citizens of the state. I would like to add some more comments.

http://www.xmlopen.org/ooxml-wiki/index.php/DIS_29500_Comments

[Note that ODF already went through this process of addressing its flaws some time ago.]

<http://www.consortiuminfo.org/standardsblog/article.php?story=20070715200544734>

<http://www.consortiuminfo.org/standardsblog/article.php?story=20070719191210450>

Some discussion on ODF vs. OOXML as far as being acceptable industry standards:

ODF was ironed out over a long period of time. The starting point for ODF had already been a public document for a few years. ODF leverages many W3C and other existing public standards, some of which have been standards for a while. Taking that into account, ODF and ODF pre-drafts were out in the open for a very long time. In contrast, OOXML came out of Microsoft a short time ago, and additionally, because it doesn't reuse that many other standards that have been out in the open, fewer in the public have had the time to study it carefully as had the time to analyze pre-ISO ODF. This means that probably many of OOXML's flaws have not yet been discovered. Despite this, it appears many errors have been discovered already, flaws which are not addressed in OOXML today as proposed.

In response to a possible partial rebuttle that

Microsoft may have used something like OOXML internally for a while: An internal company standard is not like a public standard because there is much that is understood within an organization that is never spelt out in detail carefully so that multiple sources from the outside would be able to implement interoperable products solely based on the descriptions used within that internal standard. Simply put, it is only through the tedious process of taking a format public and fixing the issues brought up from extensive public feedback, where many potential conflicts that were overlooked by those with insider knowledge get pointed out to them, that you can reach the point of having a useful public standard. ODF went down this road for many years before being proposed to ISO, and even then, it relied more heavily than OOXML on reusing existing public standards. OOXML has just started down this path, reused fewer existing standards, yet wants to become an ISO format already? I am even giving Microsoft the benefit of the doubt here that they had formalized the standard internally for some time (otherwise this hypothetical rebuttle doesn't even get off the ground). The reality is that Microsoft likely reversed-engineered some of the components of OOXML from code they analyzed only a short time prior to presenting OOXML to the public. OOXML stands today in a similar position that the original public Star Office/ Open Office formats stood which was a few years before being submitted to ISO.

ODF reused what was available before it. OOXML did not (to any appreciable extent). That in itself is the biggest strike against OOXML. Note that the original Star Office formats which formed some of the roots of ODF was modified a lot over time to reuse then existing standards. At one point probably Star Office and MS Office formats used zero of the W3C XML family of standards (among others). What became ODF had been worked over for a prolonged period of time to reuse the existing investments by the industry. OOXML as proposed today has been thrown at the industry. You need look no further than the ridiculous length of OOXML standard as an indication of how little of the industry investments in standards it reused. For example, the ODF specification maintains its modest size because it incorporates many existing standards by reference. This fact is what enabled many industry

players to understand and trust most of ODF before having read even a single word of the specification. And with OOXML being proposed after ODF, OOXML supporters have the extra burden to argue just why a whole new standard would be better (especially considering the huge overlap in functionality with ODF and the extreme length of the OOXML specification) rather than the alternative of having a proposal to augment ODF to round out any potential omissions that OOXML brings to the table. If only Microsoft had worked with OASIS when it was asked for input, instead of possibly using OASIS to build OOXML behind the scenes.

OOXML as drafted today has many errors. Microsoft should work to clean up OOXML with its partners so that their next proposal to ANSI/ISO is able to actually lead to increase competition for the OOXML format. If done properly, Microsoft customers would benefit from the added competition at such time that OOXML-Improved becomes a formal standard. If OOXML, flawed as it is, is rejected by standard making organizations, it would help the customers as ODF adoption would likely increase, and ODF is a vendor-neutral standard already implemented by several products. If OOXML-Flawed is accepted, the customers would come up short, as no one outside Microsoft (and perhaps a few working as Microsoft proxies, meaning Microsoft maintains control and earns royalty income from these "competing" products) has either the knowledge or the motivation to implement this currently flawed 6,000+ page specification.

Microsoft has a real opportunity to clean up OOXML and fully specify the old MS Office data formats referenced in OOXML (allowing others to be able to implement OOXML). The rest of the industry has tried to be helpful and point out flaws, but Microsoft is the only company that can fix and finish up the standard. The ball really is in their court. Hopefully Microsoft will hear the voices of their customers and make the right decision.

What is in Massachusetts' best interest:

I can't answer this, but it would benefit the state government agencies to recognize that a monopoly vendor is not in the customer's best interest [though

the monopolist would argue otherwise naturally]. The whole reason to have an open standard's policy, I would imagine, would be to level the playing field to ensure that the needs of Massachusetts are more likely to be taken seriously. One such very important need is the ability to have chosen documents be accessible for all time. Real competition is also likely to result in more options for Massachusetts agencies, lower prices, and better access for Massachusetts citizens. If the standards used aren't fully open and very well specified, this won't happen.

The citizens of Massachusetts would benefit from having the option to access government online documents in a format that is supported by no-cost and freely available and shareable open source applications. In the past, this was possible for standardized ANSI text files. Today, it is also possible to achieve this for documents with interesting formatting stored using the PDF or ODF open formats. There are open source readers and writers that understand both of these formats. [Note that the open source software sometimes serves as a lowest common denominator implementation that the industry extends in various ways for commercial reasons. The basic software is freely available and extensible by any entity commercial or otherwise for no charge.] This scenario is the most flexible for the end user as it ensures some guaranteed level of control and safety over one's data. Only real open source can fully be audited and can be guaranteed to be controlled by the end user. These are very important reasons many serious citizens will want to always have the option to use real open source products devoid of any proprietary plugins or extensions on their computing platforms where they also keep their private data. The OOXML format does not meet this fundamental open source test.

As a final word on monopoly techniques. One of the most potent weapons used against the customers is to give the illusion that there exists competition. This allows real changes that would introduce actual competition not to be implemented. The customer then ends up short-changing themselves by not taking advantage of their buying power to make any significant demands on the monopolist. OOXML is a vehicle being used to give the impression that

competition is possible and so eliminate in the customer's mind the need to demand significant change from the vendor monopolist.

Thank you for giving me the opportunity to once again express some concerns.

A former Massachusetts resident,
Jose Lorenzo

Sick sense of humor? Visit Yahoo! TV's
Comedy with an Edge to see what's on, when.
<http://tv.yahoo.com/collections/222>

From: [T. Hunt](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ECMA 376
Date: Friday, July 20, 2007 8:42:30 PM
Attachments:

I'm writing as a citizen of the USA because I will someday possibly have to rely on or inter operate with documents stored by the state of Massachusetts.

One of the results of the open document debate is what access will the average citizen have to his/her state's records. One of the ideas of an 'open format' is that anyone who has a compatible program can view, edit and archive those documents. Many organizations can offer different software packages that will do this and they will vary from totally free to very expensive, depending on their usefulness, complexity, and target audience. This would cover everyone from a single retired citizen to large corporations.

But the crux of the matter is whether the standard is really an open standard. In order to be open, all of the standard document format must be published so that anyone who desires can build a text editor around the properties contained in the standard and sell/distribute/give it away however they want in the free marketplace.

For this to be a truly open standard, the standards on which OOXML is based have to be available in their entirety to everyone without the constraints of NDAs, covenants not to sue or anything else. All of its inner workings must be available without the need for any proprietary extensions or parts owned by any single company, so it will inter operate with all of the existing formats it purports to support and the way it does this will be open knowledge to all. As long as Microsoft controls any part of this and keeps it closed, it cannot be said to be an open standard.

I would recommend against adopting OOXML as an open standard at this time.

Thomas K. Hunt

Austell, GA

From: [eDatamate](#)
To: [Standards \(ITD\);](#)
CC:
Subject: RA:ETRM v4.0
Date: Friday, July 20, 2007 6:55:48 PM
Attachments:

JD Software Inc
5 Priscilla Rd,
Swampscott, MA 01907

July 20 2007,

As a Massachusetts resident and a software engineer I take this opportunities to congratulate ITD for its continuing effort to pave the way in adopting consistent architectural frameworks and defining standards to improve the commonwealth's information technology infrastructure.

I recently had a chance to review the Enterprise Technical Reference Model (ETRM) v.4.0 and was pleased with ITD's decision to include Ecma-376 Office Open XML Formats. This open and royalty free specification provides easier integartion and a compact format that is in accordance with ITD's vision.

Thank You,
Lhassan Oubala

From: [Diana Chapman Walsh](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF Open Document Format
Date: Friday, July 20, 2007 6:40:44 PM
Attachments:

Please adopt the ODF Open Document Format so that future computer users will be able to use any program to open and read and work on files created in the coming years.

Yours truly,

Diana Chapman Walsh
90 Baxter Road
Brookline, MA 02445
617-232-5795

From: [Lucas Lay](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Objections to OOXML
Date: Friday, July 20, 2007 6:04:30 PM
Attachments:

To whom it may concern,

While I'm not a resident of Massachusetts, (I live in Southern California) I would still like to voice my opinion regarding OOXML in the hopes that other states would follow Massachusetts's lead in rejecting OOXML file format as acceptable standard.

By definition, any standard that is controlled by a single vendor is not an open standard. Just for arguments sake, suppose Microsoft is an Chinese-government-owned company, would it still be acceptable as an "open standard" file format?

I just cannot understand, how people seemed unable or unwilling to see the hidden agenda of Microsoft in promoting its own file format standard (which it itself controls) in competition to ODF. One can already observe those agenda at work. Take for instance the ODF translators. Instead of integrating ODF format support directly into its products, Microsoft chose to "support" ODF via low-priority add-on. It is obvious, that Microsoft is trying to make it problematic for users to save in ODF format.

From past experience, one can easily see the effect of Microsoft's refusal to fully support ODF is. From the user's perspective, any problems in saving the file in ODF is perceived as bugs in the ODF file format. This creates preference in the user's mind to save the file in OOXML. Eventually, people would have saved enough documents OOXML format for Microsoft to drop ODF support completely -- effectively they would have killed-off ODF as a viable file format.

Indeed, Microsoft has a long history of creating proprietary "standards" as tactic to gain market dominance. Jscript, C#, C++/CLI, XPS, to name a few are all Microsoft-created "standards" to kill-off any non-proprietary standards in order to gain dominance.

Microsoft, as a dominant software vendor of Office applications has a responsibility to support open standards in order to promote interoperability. Instead of such responsible actions, Microsoft have time and time again used its dominance to create vendor-lock-in, drive out competition and prevent true interoperability.

I hope you'd join me in saying "NO" to OOXML file format.

Thanks for your time,

Lucas Lay.

Heute schon einen Blick in die Zukunft von E-Mails wagen? Versuchen Sie's mit dem neuen Yahoo! Mail. www.yahoo.de/mail

From: [Jose R Rodriguez](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Comment Ecma-376 ETRM v4.0
Date: Friday, July 20, 2007 5:57:37 PM
Attachments: [comment07-20-2007Ecma-376 ETRMv4.0 Massachusetts.odt](#)
[comment07-20-2007Ecma-376 ETRMv4.0 Massachusetts.doc](#)

Information Technology Division

Commonwealth of Massachusetts

Attn.: Ms. Bethann Pepoli, Acting ITD CIO

Ms. Bethann Pepoli,

Although I am a resident of California, I became inclined to submit my input regarding Massachusetts' decision to potentially extinguish innovation, true freedom of choice, and continue the arbitrary vendor lock-in of Massachusetts residents, due to the inclusion of Ecma-376 Office Open XML (OOXML) in Massachusetts ETRM v4.0.

My name is Jose R Rodriguez, Ms. Bethann Pepoli. I am also the CIO of Metztli Information Technology, a small entity doing business in California; we promote open source and open standards as the only viable formula for continued innovation and collaboration, as showcased by the success of the Internet truly open specification protocols/formats, like TCP/IP and HTML, owned by no one but freely implementable by any entity --regardless of size.

As someone who has been touched directly by the courage of Massachusetts CIOs who dared to question the proprietary encroachments on public records by self serving entities, I want to say thank you. Following your leadership, California's Assemblyman Mark Leno introduced Assembly

Bill 1668 on February 23, 2007, with the aim “...to create, exchange, and preserve all documents, as specified, in an open extensible markup language-based, XML-based file format, and to start to become equipped to receive any document in an open, XML-based file format. ” <
http://www.leginfo.ca.gov/pub/07-08/bill/asm/ab_1651-1700/ab_1668_bill_20070223_introduced.pdf >

Needless to say, prior to Open Document Format (ODF) ISO standard –and to Massachusetts' insightful leadership-- California's assembly bill would not have been viable. Innovation in alternative implementations of document formats by competing office suites has been essentially halted due to a single vendor controlling the prevailing proprietary document specification (and the office suite to implement it, i.e., the implementation tool) since the early 1990s. The inclusion of OOXML in Massachusetts' ETRM v4.0 represents a tacit encouragement for the continuation of that vendor's suffocation of innovative alternative office suite implementations due to the unique vendor centric 6000+ pages of OOXML specification.

ODF, on the other hand, has shown its viability to be implemented by various entities. Large vendors like IBM and Sun Microsystems have implemented the ODF specification in products like Workplace Managed Client 2.6, and StarOffice, respectively. Open Source Communities have implemented ODF most notably in KDE Office Suite and OpenOffice --the free office suite that I am using to write my commentary to Massachusetts, under the free Debian operating system (<
<http://www.metztli-it.com/oofficeDebian.jpg> >); the same can not be claimed of OOXML where the 6000+ pages of specification will represent an effective obstacle for other than the proprietary vendor promoting OOXML.

Further, within those 6000+ pages detailing OOXML specification, there is no guarantee that its major proponent will not raise Intellectual Property (IP) issues threatening those would be competitors that might attempt to implement the OOXML specification. Those of us who advocate open source and open standards are too familiar with the tactics of the OOXML vendor proponent so as to trust a commitment by the latter not to spread publicly Fear, Uncertainty, and Doubt (FUD) against those would be competitors.

Apropos, Ms. Pepoli, in order to take care of any conflict of interest that may arise, let me disclose that Metztli Information Technology, is a member of the Open document Format (ODF) Alliance. Metztli Information Technology relationships are forged based on the free will of association of the market and are based on mutual alignments of interest around open source, open standards --open specifications with no strings attached. Those relationships were not coerced via public threats to forge alliances; our business relationships are unlike those exhorted by the OOXML vendor proponent that seeks relationships with OSS vendor entities by using IP threats (<
http://money.cnn.com/magazines/fortune/fortune_archive/2007/05/28/100033867/ >)
against them.

Ms. Pepoli, I hope that Massachusetts will reconsider its position and exclude the pseudo open format OOXML from its ETRM v4.0. Accordingly, in the interest of encouraging innovation through competition in the market place that will ultimately benefit Massachusetts' constituents, Metztli Information Technology encourages you to settle on an truly open document specification standard not owned and not implementable by only a single vendor. I encourage Massachusetts to settle on ODF for the benefit of its constituents and those in other regions of the United States, like California, and the world who are following your lead.

Sincerely,

Jose R Rodriguez
<http://www.metztli-it.com>

From: [Jose R. Rodriguez](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Comment Ecma-376 ETRM v4.0
Date: Friday, July 20, 2007 5:34:01 PM
Attachments: [comment07-20-2007Ecma-376 ETRMv4.0 Massachusetts.odt](#)
[comment07-20-2007Ecma-376 ETRMv4.0 Massachusetts.doc](#)

Information Technology Division
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http://www.leginfo.ca.gov/pub/07-08/bill/asm/ab_1651-1700/ab_1668_bill_20070223_introduced.pdf

>

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(<

http://money.cnn.com/magazines/fortune/fortune_archive/2007/05/28/100033867/

>) against them.

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Sincerely,

Jose R Rodriguez

<http://www.metzli-it.com>

From: [Stephen Samuel](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Comments on ETRM 4.0
Date: Friday, July 20, 2007 5:28:20 PM
Attachments: [etrm-comments.odt](#)
[etrm-comments.txt](#)

It is attached in ODF format (preferred format).
I will also attach a pure text version.

--

Stephen Samuel <http://www.bcgreen.com>
778-861-7641

From: [Joe Waliga](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OOXML vs. ODF
Date: Friday, July 20, 2007 5:24:52 PM
Attachments:

Open Documentation Standard in the Commonwealth of Massachusetts - Note to governor

Hello Governor Patrick and Standards Committee,

I am not a resident of Massachusetts. But I am a citizen of the United States. Please hear me out. The "Open Documentation Standard in the Commonwealth of Massachusetts" is an important issue, since this "Open-Document" issue started in Massachusetts, whatever the state decides on this issue will set a precedence for the other states to follow. And I believe the state of Massachusetts must not compromise the original idea that it should be able to have access to information stored in non-proprietary formats. Computer users have had proprietary formats for the past 20 years. You have to look at the technical specs of the format and consider for yourself if the format complies with the original openness policy. The policy dictates how open you want the document. Why even debate about this if you want to adopt OOXML as an open standard when really, OOXML is a proprietary format in it's usage, because Microsoft office will use a binary component to store the data, which it will have control over. Also, Microsoft has a full hands-on control on the format, as far as what software will be compatible with the format, what companies are allowed to use the format, and what platforms the format can be used on. The ODF format is completely wide open, freely accessible to any developer of any program of any platform without control of Will from the creator of the format. Microsoft single-handedly still has control over the OOXML format. There is a difference. And just because Microsoft has a lot of money to lobby and influence votes internally in the legislature of the State does not mean that what they say it is right for the

commonwealth of the people of Massachusetts. When the decisions of a legislature of any government is directly influenced by the lobbyists and lawyers and money of the Microsoft corporation, all they are doing is protecting Microsoft's monopoly and causing government to disallow and open and free market and putting the same restrictions on the commonwealth that they have had for the past 20+ years. It is time for the State of Massachusetts to establish a firm policy to say that "Open is Open" and anything else less than that is closed. OOXML, while partially and initially appears to be open, it's full implementation includes elements that are not open. Therefore, it is not a true open standard. ODF is fully open. There is a black-and-white to this. No more grey areas. And your decision in this matter will set a precedence to the commonwealth that will come after you when you are gone. This is the bottom line, I think. Do you want legible information accessible to future generations, or do you want the information under the indirect control of a corporate entity? If Massachusetts allows OOXML to be classified as a completely neutral and open standard, and allows its use as an open standard, you will soon find out that it is not and that the situation that all of us have is the same situation we have had for the past 20+ years, and that is, having information locked into proprietary formats. Only allow true open formats. ODF is currently the only wordprocessing format that provides true and forever lasting openness and accessibility of information. OOXML does not.

Now to dispell another misunderstanding. Microsoft Office could use the ODF format natively (not through a translator) if Microsoft wanted to. It does not require a royalty payment to use in a program. StarOffice/OpenOffice could use OOXML, but in order to fully use the format to be transparent with Microsoft Office, they would have to pay a royalty fee if Microsoft allowed them to use it. And of course, Microsoft will still be in fully control, thus killing free market development of the software. So formats and programs do not necessarily go together, even though it would appear it does. This is because of format/program association. So that means, if you hold the true open standard ODF as the standard, microsoft could easily use its 7.1 Billion R&D dollars to support it. But why all the fuss? Because Microsoft, a

specific vendor, wants control like they always have from the beginning. Learn from the past. ODF, created by many companies, groups, and efforts, only want to give you what you want. Freedom. Chains or Freedom? It's your choice. I hope the State of Massachusetts chooses True and Pure Freedom. Many American have paid for our freedoms with their blood. Please do not sell out to specific corporate interests. Sell out to Freedom.

ODF can be supported by anyone with the help of Sun or IBM. OOXML can only be supported by Microsoft. For concern of the people and as a trend-setting ruling in the U.S., you should not want vendor lock-in. You should want the opportunity to be vendor neutral.

- Joe Waliga
United States Citizen

Building a website is a piece of cake. Yahoo! Small Business gives you all the tools to get online.
<http://smallbusiness.yahoo.com/webhosting>

From: [Marino Marcich](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Comments on Behalf of ODF Alliance
Date: Friday, July 20, 2007 5:14:05 PM
Attachments: [ODFA_CommentsETRMv4.0_20July2007.odt](#)
[ODFA_CommentsETRMv4.0_20July2007.pdf](#)

Please find the enclosed comments on the Draft Enterprise Technical Reference Model (ETRM) v. 4.0 on behalf of the OpenDocument Format Alliance.

Marino Marcich
ODF Alliance
1090 Vermont Avenue, NW, 6th Floor
Washington, DC 20005
Direct Line: 202-789-4450
Mobile: 202-251-2901
Main Switchboard: 202-289-7442
Fax: 202-289-7097
Email: mmarcich at odfalliance.org

www.odfalliance.org

From: [GrokLaw OnceOnly](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Amended: Enterprise Technical Reference Model v. 4.0 Public Review Draft (added Groklaw 07-20-2007 info at end)
Date: Friday, July 20, 2007 5:11:56 PM
Attachments:

See:

"Questions for Microsoft on open formats " at
<http://news.bbc.co.uk/1/hi/technology/6291124.stm>

and please... do not include the Microsoft "not-open" OOXML format in the Enterprise Technical Reference Model v. 4.0 -

Microsoft's use of the word "open" is a sham and one has to question if it is or is not an outright lie in order to twist the weak minds of some into thinking that Microsoft's formats are open.

Read Microsoft's dirty tricks url below to see how Microsoft acts with others and standards. You can not change those Microsoft Monoploy based formats in to spots of a different color (the MS formats are not OPEN at all). Support -only the ISO Open Document Format (ODF) as this is the only truely open format... that has been developed by a group of individuals, education folks, business folks for it to be a usable format for the next 200 plus years. Reject - the Microsoft OOXML fomate one is a marketing play on words that is solely owned and developed by only Microsoft! The Microsoft business strategy is to NOT have a long lasting standard format, instead Microsoft's formats are now and have been designed as only a Microsoft ONLY usable format (the is a format that you know they must change to make the commonweath upgrade it's software to a newer format in the future). If you didn't have to change formats you would not have to upgrade. So, over the next 200 years will ISO ODF be a lower cost solution - Of course it will be - because it is also a "free to use" format that is designed to last a user 200 years and longer. Microsoft does not want the commonwealth not to pay them money to upgrade... they want the money paid every 3-4 years for the next new format they will invent for one reason (only to make money for Microsoft). How

many times do we need to buy another word processor... with ODF it will be never as software like OpenOffice.org is free to use... just ask the country of FRANCE as their tax department is using OpenOffice.org and ODF on about 80,000 computer (works on Windows, Linux, and Apple computers freely). If you would like information on how Microsoft plays (or does not play fairly)...

See:

http://www.grokdoc.net/index.php/Microsoft%27s_Standards_History
and

http://www.grokdoc.net/index.php/Dirty_Tricks_history

in this section you can read all about: " MS OfficeOpenXML MS' answer to ISO Open Document Format. OfficeOpenXML is an ECMA standard, Ecma-376, that implements MS Office 2007 (note, MS Office does not follow or implement the standard, it is the other way round). MS has played as dirty as they could to fight ODF. Just browse Consortium Info, Walt Hucks' blog, or Groklaw's ODF/XML page and follow the links for the story of ODF in Massachusetts and EOOXML in general. A quote from James Love on participants of the "Internet Governance Forum" on open standards: Many people are nervous about these issues, because Microsoft is investing millions to defeat them, and to attack personally government officials who Microsoft sees as too friendly to open standards, and to reward politicians and government officials who back Microsoft. This is no empty threat. Look at the story of Peter Quin, a government official who dared to back ODF. It is rather common to encounter cynicism with respect to Microsofts' intentions with the standardization efforts around EOOXML. EOOXML needs ISO approval to be eligible for governments bids because "Governments worldwide mandate that only internationally agreed open standards are acceptable when creating documents". A good example of the common feeling is found in Six thousand pages, one month, no chance...: Its preferred answer is to create its own open document format - OOXML - which can then be recognised as such by the international standards bodies. However, it does not want this to be something that its competitors can adopt freely. The answer is to game the system. As part of this, the company has created (by itself, unlike Open Doc) a proposal for OOXML that is six thousand pages long, and then put it into the fast-track approval system with very minimal time for discussion and objection. GrokDoc has a page to file EOOXML objections to the ISO fast track procedure and two Groklaw articles explaining it, Searching for Openness in Microsoft's OOXML and Finding Contradictions and Deadline Looms to Express Concerns about ECMA 376 Office Open XML, with the usual plethora of insightful comments. For a quick

comparison of ODF and EOOXML, see Rob Weir's OpenOffice.org Conference 2006 presentation. This also goes into performance questions. A more extensive comparison is given by The Open Document Fellowship, both in general terms and in more technical terms. Sam hiser has written an excellent summary of the differences in "usability" of the standards *Achieving Openness: a closer look at ODF & OOXML*, a must read for the arguments. The ODF standard was designed with (legacy versions of) MS Office documents in mind. In contrast, EOOXML was not developed as a standard, but as a description of MS Office 2007, without regard to anyone else (see this historical comment on the mindset of MS developers). Therefore, EOOXML implements mostly a subset of what is possible under ODF. This history is explained in a Groklaw comment by Garry Edwards. In short, MS claims EOOXML is needed because ODF cannot represent all legacy MS Office formats and is inefficient. The ODF "camp" has created the Da Vinci converter plugin and claims 100% round-trip fidelity between ODF and the last MS Office binary formats. Furthermore, this plugin also proves the efficiency of the ODF format. Note that the final release of MS Office 2007 mysteriously broke the plug-ins as discussed by Dana Blankenhorn in *Microsoft playing three card monte with XML conversion*. We learn the real reason MS couldn't standardize on ODF from Bill Hilf of MS himself, as recorded by Dinesh Nair in the *Open Malaysia* blog: What got really interesting was when Yusseri raised the issue of OOXML and why didn't Microsoft just work on ODF in collaboration instead of creating a new, bloated standard. Bill's answer was quite surprising, as he clarified that the file format (OOXML) was a part of the software and that OOXML and the software (MS Office) are quite inseparable. Ergo, OOXML is an integral and inseparable part of MS Office. That's why they could not adopt ODF as the file format for subsequent versions of MS Office. So all the rumours that OOXML is nothing but a dump of Office 2007 and not an international, free and open standard are now confirmed by a MS spokesman. In the run-up of the decision whether or not EOOXML should take the ISO fast track, MS tried to convince the National Bodies that they are not allowed to vote against EOOXML because EOOXML could physically exist next to ODF (succeeding with the US NB), see Rick Jelliffe's and Brian Jones' blogs. This campaign tried to confuse the technical bodies with an unreasonable strict technical definition of a contradiction, ignoring the fact that this phase is intended to identify obstacles to trade (monopolies) and violations of international trade rules as is explained by Marbut. The campaign even became comical, see *Open Malaysia: Microsoft's Definition of Contradictions* and *The Art of Rewriting History*. It didn't work that well, given that many countries filed objections, see Andy Updegrave's blog post and his

comments on the actual responses. In the end, MS seem to just buy their way to an ISO standard by swamping the voting members with their employees. So MS will have a majority by making sure that most voting individuals are on their payroll. (On a personal, opinionated note: What is the worth of a voting system where the majority of the voters get sacked if they vote against a single entity) [edit]

Licensing MS EOOXML is advertised as an "Open" standard by Microsoft. So it is expected that the license for it's use will at least match the openness of ODF and PDF. Two questions will be asked by any prospective user: 1. Can someone stop me if I write and distribute an application that uses this standard? 2. Under what conditions can I use this standard? For ODF and PDF the answers are, respectively, Noone (1) and some conditions on the use of the name PDF (2). How is this for EOOXML? Microsoft has written the standard and currently has the only working implementation of EOOXML. Therefore, MS are the only ones who know what copyrights and patents must be licensed from MS and third parties to implement EOOXML. But as of January 2007, Microsoft have consistently refused to identify the copyrights and patents that must be licensed to implement EOOXML. The language used by MS in the EOOXML licenses and "covenants not to sue" is so intricate (and peculiar), that many people still doubt whether it really allows anyone but Microsoft to implement EOOXML. Microsoft has changed the licenses for EOOXML during the years. The initial offer for licensing was seriously flawed as of March 2005. In December 2005, there were still major worries about the pledges not to sue by Microsoft and the ECMA terms of reference. But as late as the start of 2007 there were still doubts whether it would be legal to implement the standard in a meaningful way. To quote the conclusion of Analyzing the Microsoft Office Open XML License: In this way, the License is stated and is to be perceived as a threat rather than a promise. In effect it says 'Stay away! Microsoft is the only entity which may implement the Microsoft Office Open XML formats!' This is a fundamental contradiction of the purpose of an open standard. In the comments section of this blog, Marbux remarks that the peculiar language chosen for the EOOXML license makes him conclude that But as a legal foundation for building apps that can take thousands of person-hours, this covenant not to sue is legal quicksand of unknown depth. Or, as Andy Updegrove puts it: And taking that concern a step further, consider the fact that OOXML also apparently violates section 2.14 of the ISO/IEC Directives, Part 1, in that not all of what it takes to implement OOXML appears to be covered by Microsoft's patent pledge, in two respects. First, the pledge does not explicitly cover material that is referenced, but not included in the specification, and second, the Microsoft patent commitment does not cover optional features. Sections of

OOXML that are not fully described include those that require compliant implementations to mimic the behavior of Microsoft products, such as those products and capabilities referred to above (OLE, etc.) Microsoft will need to clarify whether its patent commitment will in fact extend to these requirements. Potentially, these concerns would involve large portions of OOXML, in contradiction of the ISO/IEC requirement that more than a bare-bones implementation must be permitted without fear of infringement. Most of this is also discussed in Searching for Openness in Microsoft's OOXML and Finding Contradictions and the GL EOOXML objections project page. There is also a Microsoft commissioned evaluation of the license by Baker and Mackenzie from 2006. See, eg, these discussions on GL and the Grokdoc Talk:Objections page. Basically, the Baker and Mackenzie does not address any of the criticisms leveled against the two licenses: Covenant Not to Sue (CNS) and the Open Standards Patent (OSP) license. The report has some careful choice of words, but nowhere does it state that a blanket patent license is given for implementing the EOOXML specifications in full. This all can lead to rather comical dialogs with MS legal representatives as was exemplified in this OpenMalaysia blog Billions of Documents. At a SIRIM TC4 meeting on ECMA 376, Microsoft was represented by Stephen Mutkoski (a lawyer). A member of the technical committee asks a simple question: They sent a lawyer to a Technical Committee briefing. Okay, perhaps we could get more legal information then. ... So if Macros are not included in Ecma 376, will developers who develop it independently get sued?" "I will have to get back to you ...” To summarize the licensing problems, the answers to the above questions for your future EOOXML compliant software can be provisionally given as: 1. Microsoft can stop any attempt to distribute your application 2. You need permission from Microsoft for every application of EOOXML on a computer [edit] (In-)Compatibility with other standards MS wants its own XML format to be an ISO standard. However, MS' format does not conform to many other ISO or W3C standards. You might even think MS doesn't like the W3C ;-): See eg, Wikipedia, OpenDocument Fellowship, Open Malaysia: MSOOXML's disregard for existing standards and, of course, Bob Sutor's blog. See also this GL discussion: Again from the newspick: a description of why ODF and OOXML don't interoperate. Office Open XML unquestionably duplicates or at least significantly overlaps with the ODF specification; moreover, unlike Office Open XML, OpenDocument incorporates still other standards such as XPath, XLinks, SVG, XForms, and MathML. Office Open XML reinvents the wheel at every turn rather than relying on existing open standards. The failure to implement XPath in Office Open XML is particularly problematic; it makes full fidelity in

automated XSL transformations to and from other XML formats next to impossible. That problem creates a contradiction in the ISO sense; full interoperability between ODF and EOOXML applications is infeasible. According to the Wikipedia Xpath is the following: XPath (XML Path Language) is an expression language for addressing portions of an XML document, or for computing values (strings, numbers, or boolean values) based on the content of an XML document. The XPath language is based on a tree representation of the XML document, and provides the ability to navigate around the tree, selecting nodes by a variety of criteria. In popular use (though not in the official specification), an XPath expression is often referred to simply as an XPath. Originally motivated by a desire to provide a common syntax and behavior model between XPointer and XSLT, XPath has rapidly been adopted by developers as a small query language. I gather that if OOXML do not implement Xpath, then documents in this format cannot be queried using normal XML tools. For example Wikipedia says the following on XSLT. XSLT is a specific kind of template processor primarily designed to "transform" XML documents into other XML documents. The original document is not changed; rather, a new document is created based on the content of an existing one.[3] The new document may be serialized (output) by the processor in standard XML syntax or in another format, such as HTML or plain text.[4] XSLT is most often used to convert data between different XML schemas or to convert XML data into HTML or XHTML documents for web pages, or into an intermediate XML format that can be converted to PDF document [snip] XSLT relies upon the W3C's XPath language for identifying subsets of the source document tree, as well as for performing calculations. XPath also provides a range of functions, which XSLT itself further augments. This reliance upon XPath adds a great deal of power and flexibility to XSLT. What strikes me of such tactics is they are borderline on misrepresentation. When a supplier says he is using XML, most IT managers will understand a reasonably complete suite of XML related standards will be used to generate the full benefits of XML. By silently picking and choosing which standards in the XML suite they implement, Microsoft breaks this assumption without informing its customers. Open Malaysia has a very nice writeup on the VML (non-)deprecation in MS EOOXML Is VML in or out now, or was that a typo?. So: * 1. VML is included for backwards compatibility reasons only. * 2. DrawingML is newer and richer and designed to replace VML. * 3. VML is deprecated and only included for legacy reasons * 4. New applications are strongly encouraged to use DrawingML instead This simply begs these questions: * 1. Why then is Section 2.3.1 explicitly using VML? * 2. Where are the instructions for using DrawingML instead? * 3. If DrawingML is richer and

designed to replace VML, why have VML in the first place? * 4. I would take it that Office 2007 is a "new application" and should use DrawingML instead of VML. Does it? What is extra interesting is the long first comment from Stephane Rodriguez who explains that VML was implemented to lock the internet, IE, to MS Office. So the Office team at Microsoft could not manage to get rid of VML. It is possible, unless they intentionally use it as a lock-in tool, that next version of Office, codenamed Office 14, will be the first one to have an Office-wide DrawingML implementation. Until then, Office 2007 is at odds with the specs that Microsoft is pushing and as a result, it is not a reference implementation of the specs! In other words, since there cannot be a non-Microsoft implementation of the specs (it will take at least ten years for a company starting now, and it will never achieve 100% fidelity since many things are missing in the specs), it follows that there is simply NO reference implementation out there! Quite amazing... Standards flouted in MS EOOXML (see also Rob Weir's ooocon2006 presentation and Andy Updegrave's The Contradictory State of OOOXML): * Codes for the Representation of Names and Languages ISO 639 * Computer Graphics Metafile ISO/IEC 8632 * XLink W3C * XForms W3C * XPath W3C * SVG W3C * MathML W3C * SMIL W3C * Gregorian Calendar ISO 8601 (EOOXML redefines leap years and uses two start dates for counting, 1900 and 1904, see also Brian Jones' apology blaming the bug on a programming shortcut in Lotus 1-2-3.) The 1900 leap year bug is an excellent illustration of how Microsoft treats standards as documentation of their code binaries, including all legacy bugs. Other links * The Future of Lock-in * Game Time for OpenDocument * Searching for Openness in Microsoft's OOOXML and Finding Contradictions * Deadline Looms to Express Concerns about ECMA 376 Office Open XML * Standardizing away the world's languages * Cum mortuis in lingua mortua (SVG/VML) * OOOXML has poor XML Element names [edit] Office2007 implementation At the start of 2007, only Office 2007 implements EOOXML. However, it is reported that Office2007 does prefer a binary format after all. Allegedly, for performance reasons. This GL comment says it all (see also this continuation) Checking the Rob Weir blog I notice that MS Office 2007 is not using OOOXML after all. There is yet another binary format that is silently introduced and touted as the preferred option. Rob Weir says: It is also interesting that Microsoft is positioning this format as the preferred one for performance and interoperability. The online help for Excel 2007 says: In addition to the new XML-based file formats, Office Excel 2007 also introduces a binary version of the segmented compressed file format for large or complex workbooks. This file format, the Office Excel 2007 Binary (or BIFF12) file format (.xls), can be used for optimal performance and backward

compatibility. The Gary Edwards blog (from the newspick) posted another finding of Rob Weir that I wasn't able to locate on his blog. Another interesting point, courtesy of the inexhaustible Rob Weir, is that MSOffice 2007 has the unique ability to produce two kinds of EooXML. I've never seen an application do this before, and one has to wonder why? What Rob discovered is that if you import a legacy BoB into MSOffice 2007, the application will convert it to EooXML fully preserving the originating application binary encodings \u2013 even doing so within laughably and descriptively colorful named XML tags. Fine. We can easily do that with ODF using the infamous tag model. No inadequacy to be found here. (Damn, if only we had patented that technique. Phil Boutros must be lapping this up :) One of the examples Rob pointed out is the use of the long since deprecated VRM encoding. Good work MSOffice 2007! Next Rob re created that same legacy document \u201cnatively\u201d in MSOffice 2007. Exactly the same! Saved it as EooXML. Then examined the XML, comparing the two EooXML files. Well well well. They are substantially different! Same application. Same file format. Same document content and presentation. Different EooXML!

Interestingly, for one thing there is no VRM encoding. It's been replaced by the proprietary application/platform dependent but forward Vista ready DrawingML. Some will argue that this is the only way to preserve backward compatibility. I would argue that this will result in an information nightmare. Only one of the EooXML files is backwards compatible. The other is ready for the Vista bound information processing chain centered on the Exchange/SharePoint Hub. How are organizations going to keep things straight? How can someone interoperate with Office 2007? People will have to sort out which of the ever changing file format is being produced. ISO standardisation looks pretty much like a decoy. It can be used (if at all) to send information in the MS Office suite but it will never get out. Governments that want standards for sovereignty purposes will get a "standard" but not the sovereignty. Here is Bob Sutor's opinion from We have proprietary extensions to Microsoft Office Open XML already. Here\u2019s an idea of how things are already reverting to the same old behavior, right when Microsoft is trying to convince the ISO how wonderful for interoperability their spec is supposed to be. One point being made in several places, eg, in MS Office 2007 is not using OOXML, is that Visual Basic macros in Excel (VBA) are stored in a binary (unreadable) form in EOOXML (they are not described in the standard). That is, the ASCII VB macros cannot be exported to another application using EOOXML. An anonymous comment in this blog claims that VBA macros are Excel internal and have no use outside. But other applications are implementing VB too, so that argument is incorrect. To summarize, MS warn users to not use

OOXML to store a large spreadsheet because of bad performance and that EOOXML cannot represent all information in Excel2007. These posts also suggest that a lot of the attacks on ODF, eg, bad performance on large spreadsheets (and here) and inability to represent all of MS Office features, were pre-emptive strikes to divert from the shortcomings of EOOXML itself. (and some find OO.o is faster than MS Office) [edit] Alternative Implementations As far as I know, this might be the first ISO standard that fully implements just a single product of such horrible complexity (running over 6000 pages). It costs MS themselves an estimated 150 work years to implement their own standard. However, this was later qualified by Andrew Shebanow after a response from Rick Schaut with a different set of statistics. But even after all numbers juggling, it is still not clear whether other groups can implement the exact same product, and if they can, how much time this will take. According to How to hire Guillaume Portes by Rob Weir, it is clear that Microsoft withholds essential information to fully implement EOOXML. For a more comprehensive comparison between EOOXML and ODF, see ODF/OOXML technical white paper. 'Rumours' have it that MS EOOXML is just a serialized, packaged memory dump of the internal Office data structures. As Rob Weir puts it: The astute reader will notice that this is pretty much a bit-for-bit dump of the Windows SDK memory structure. In this case the file format specification provides no abstraction or generalization. It merely is a memory dump of a Windows data structure. Bill Hilf has meanwhile confirmed these rumours as reported by the Open Malaysia blog. A good standard does contain features that help converting documents from legacy products. But it does not require a reimplementaion in the standard of all legacy formats. A good illustration how far removed EOOXML is from a real standard is given in the above mentioned How to hire Guillaume Portes by Rob Weir. A choice quote from Rob Weir, after reproducing the requirements for Word 95's spacing compatibility "between full-width East Asian characters in a document's content": What should we make of that? Not only must an interoperable OOXML application support Word 12's style of spacing, but it must also support a different way of doing it in Word 95. And by the way, Microsoft is not going to tell you how it was done in Word 95, even though they are the only ones in a position to do so. This aspect of EOOXML is consistent with the fact that MS EOOXML seems to be a memory dump of Office internal data structures. It can be imagined that MS Office stores it's own formating information in internal data structures, but uses hooks into legacy code, bugs included, to generate older formats. Legacy formats Microsoft might not know how to recreate themselves anymore. So when dumping it's internal data to file, it inserts these hooks into the XML to refer to

these legacy code fragments. How anyone without these legacy code fragments could re-implement their behavior is beyond my comprehension. Maybe someone can enlighten me about this. In his blog, Brian Jones answers some of the points of Rob Weir and accuses ODF from having unspecified elements too. But read the comments on his blog about what questions Brian does not answer (and never answers, see this GL post). Brian Jones seem to confuse unspecified formatting elements in EOOXML that affect the layout of the document with unspecified application internal settings, eg, menu bar placement, in ODF. It is clear that the latter are not intended to be portable. Moreover, Brian Jones seems to confuse OpenOffice.org with the ODF standard. For instance, when he complains that OpenOffice.org has a config setting indicating legacy line-spacing. But this config setting is definitely not part of the ODF standard. Rob Weir discusses the lack of distance between OOXML and MS Office 2007 in Essential and Accidental in Standards where he concludes: It seems to me is that OOXML in fact does have application-dependent behaviors, but only for Microsoft Office, and that Microsoft has hard-coded these application-dependent behaviors into the XML schema, without tolerance or allowance for any other implementations settings. Something does not cease to be application-dependent just because you write it down. It ceases to be application-dependent only when you generalize it and accommodate the needs of more than one application. The inclusion of application config settings into the document standard on an equal footing strengthens the picture that projects EOOXML as a semi-automatic dump of the internal data structures of MS Office 2007. (on a personal note, it find it revealing that a very experienced MS developer like Brian Jones confuses a standard with the config options of an application) In short, EOOXML contains a lot of distinct legacy formats. This point is made very clearly in another of Rob Weir's blog posts Calling Captain Kirk: The OOXML specification, at 6,000+ pages has now just sucked in the complexity of one or more versions of HTML, MHTML, RTF and WordProcessingML. It requires that a conformant application understand these formats, but forbids a conformant application from producing them. This is another example of how you never know what you're getting when you get an OOXML file. To support OOXML is not to support a single format, or even a single family of formats. To fully support OOXML requires that you support OOXML plus a motley hodgepodge of various other formats, deprecated, abandoned and proprietary. The cost of compatibility with billions of legacy Microsoft documents is that you must support their legacy of years of false starts and restarts in the file format arena. Also Andy Updegrave's blog post The Contradictory State of OOXML refers to these proprietary legacy components in

OOXML: Other parts of OOXML refer to OLE, macros/scripts, encryption and DRM \u2013 none of which are fully described. Nor has Microsoft stated whether necessary information will be supplied on a non-discriminatory basis to all (or at all). Stephane Rodriguess explains in a comment to Open Malaysia how the OLE in MS EOOXML is platform bound There is a reason why Microsoft does not document this stuff. They would have to give the documentation of OLE, which in turn would show clearly as in water that this stuff is platform-dependent : Windows. At some point, MS started to drum up "Representation" as the basic value of MS EOOXML, see Rob Weir's No representation without specification. This representation thing can be summarized as EOOXML is like a street directory without a map. It represents each address, but won't help you to find it. At this point, I am starting to seriously doubt whether even Microsoft could reimplement EOOXML from scratch."

Added:

<http://www.groklaw.net/article.php?story=20070720073215943>

We want control of Documents - and not to be controlled by Microsoft. Sovereign status of a state or commonwealth must be a priority...! Read below and understand how this affects MA and individuals.

"Finally, I want to control my own documents. I wrote them, and I wish to control them. This is the part I hope Massachusetts thinks about carefully. An important goal of government is to preserve documents so they don't become inaccessible to the public. Proprietary extensions by definition slam that door in your face, because you then lose control over your own documents. You can never have access now except through Microsoft, and if you think that company is going to be around in fifty or 100 years, you need to ask: are you positive? Can you guarantee it? And even if they are, whose documents are they now? Yours? Or Microsoft's? Who controls access?

If your goal is to avoid lock-in to a single vendor, then proprietary extensions should scare you silly. It doesn't matter then how many companies use the format or how many business partners want it or even if it is a de facto standard -- you are now dependent on one single vendor. That unhappy fate is precisely what ODF, and only ODF, can prevent.

So, why not just bite the bullet, merge ODF with Ecma-376, and make it possible for everyone to interoperate freely as we already can in email? I can send an email to my friends from my Linux computer or my Mac and they can still read it just fine, even if they do use Windows and love HTML email. I remember [Eric Kriss](#)

[told ComputerWorld](#) why not:

He said technical people at Microsoft told him it would be “trivial” to add support for ODF to the new Office 2007. The resistance to doing so came from the vendor’s business side, according to Kriss...."

So - Microsoft thinks that ODF and "Open Standards" are NOT agreeable to their business plan.

If you notice the dance that Microsoft is doing all over the world... it is to exclude and destroy any open standard that everyone can use (as it not in the best interest of Microsoft's balance sheet to have an open solution)!

See the following articles and the comments that follow as well:

- [Proprietizing Standards](#), 10:25 AM <http://www.groklaw.net/article.php?story=20070720073215943>
- [Notes from Portugal on the July 16th Meeting on Ecma-376](#), Wednesday 05:18 PM <http://www.groklaw.net/article.php?story=2007071812280798>

Thank-you!

Ready for the edge of your seat? [Check out tonight's top picks](#) on Yahoo! TV.

From: [GrokLaw OnceOnly](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Amended: Enterprise Technical Reference Model v. 4.0 Public Review Draft (added Groklaw 07-20-2007 info at end)
Date: Friday, July 20, 2007 5:11:27 PM
Attachments:

See:

"Questions for Microsoft on open formats " at
<http://news.bbc.co.uk/1/hi/technology/6291124.stm>

and please... do not include the Microsoft "not-open" OOXML format in the Enterprise Technical Reference Model v. 4.0 -

Microsoft's use of the word "open" is a sham and one has to question if it is or is not an outright lie in order to twist the weak minds of some into thinking that Microsoft's formats are open.

Read Microsoft's dirty tricks url below to see how Microsoft acts with others and standards. You can not change those Microsoft Monoploy based formats in to spots of a different color (the MS formats are not OPEN at all). Support -only the ISO Open Document Format (ODF) as this is the only truely open format... that has been developed by a group of individuals, education folks, business folks for it to be a usable format for the next 200 plus years. Reject - the Microsoft OOXML fomate one is a marketing play on words that is solely owned and developed by only Microsoft! The Microsoft business strategy is to NOT have a long lasting standard format, instead Microsoft's formats are now and have been designed as only a Microsoft ONLY usable format (the is a format that you know they must change to make the commonweath upgrade it's software to a newer format in the future). If you didn't have to change formats you would not have to upgrade. So, over the next 200 years will ISO ODF be a lower cost solution - Of course it will be - because it is also a "free to use" format that is designed to last a user 200 years and longer. Microsoft does not want the commonwealth not to pay them money to upgrade... they want the money paid every 3-4 years for the next new format they will invent for one reason (only to make money for Microsoft). How

many times do we need to buy another word processor... with ODF it will be never as software like OpenOffice.org is free to use... just ask the country of FRANCE as their tax department is using OpenOffice.org and ODF on about 80,000 computer (works on Windows, Linux, and Apple computers freely). If you would like information on how Microsoft plays (or does not play fairly)...

See:

http://www.grokdoc.net/index.php/Microsoft%27s_Standards_History
and

http://www.grokdoc.net/index.php/Dirty_Tricks_history

in this section you can read all about: " MS OfficeOpenXML MS' answer to ISO Open Document Format. OfficeOpenXML is an ECMA standard, Ecma-376, that implements MS Office 2007 (note, MS Office does not follow or implement the standard, it is the other way round). MS has played as dirty as they could to fight ODF. Just browse Consortium Info, Walt Hucks' blog, or Groklaw's ODF/XML page and follow the links for the story of ODF in Massachusetts and EOOXML in general. A quote from James Love on participants of the "Internet Governance Forum" on open standards: Many people are nervous about these issues, because Microsoft is investing millions to defeat them, and to attack personally government officials who Microsoft sees as too friendly to open standards, and to reward politicians and government officials who back Microsoft. This is no empty threat. Look at the story of Peter Quin, a government official who dared to back ODF. It is rather common to encounter cynicism with respect to Microsofts' intentions with the standardization efforts around EOOXML. EOOXML needs ISO approval to be eligible for governments bids because "Governments worldwide mandate that only internationally agreed open standards are acceptable when creating documents". A good example of the common feeling is found in Six thousand pages, one month, no chance...: Its preferred answer is to create its own open document format - OOXML - which can then be recognised as such by the international standards bodies. However, it does not want this to be something that its competitors can adopt freely. The answer is to game the system. As part of this, the company has created (by itself, unlike Open Doc) a proposal for OOXML that is six thousand pages long, and then put it into the fast-track approval system with very minimal time for discussion and objection. GrokDoc has a page to file EOOXML objections to the ISO fast track procedure and two Groklaw articles explaining it, Searching for Openness in Microsoft's OOXML and Finding Contradictions and Deadline Looms to Express Concerns about ECMA 376 Office Open XML, with the usual plethora of insightful comments. For a quick

comparison of ODF and EOOXML, see Rob Weir's OpenOffice.org Conference 2006 presentation. This also goes into performance questions. A more extensive comparison is given by The Open Document Fellowship, both in general terms and in more technical terms. Sam hiser has written an excellent summary of the differences is "usability" of the standards Achieving Openness: a closer look at ODF & OOXML, a must read for the arguments. The ODF standard was designed with (legacy versions of) MS Office documents in mind. In contrast, EOOXML was not developed as a standard, but as a description of MS Office 2007, without regard to anyone else (see this historical comment on the mindset of MS developers). Therefore, EOOXML implements mostly a subset of what is possible under ODF. This history is explained in a Groklaw comment by Garry Edwards. In short, MS claims EOOXML is needed because ODF cannot represent all legacy MS Office formats and is inefficient. The ODF "camp" has created the Da Vinci converter plugin and claims 100% round-trip fidelity between ODF and the last MS Office binary formats. Furthermore, this plugin also proves the efficiency of the ODF format. Note that the final release of MS Office2007 mysteriously broke the plug-ins as discussed by Dana Blankenhorn in Microsoft playing three card monte with XML conversion. We learn the real reason MS couldn't standardize on ODF from Bill Hilf of MS himself, as recorded by Dinesh Nair in the Open Malaysia blog: What got really interesting was when Yusseri raised the issue of OOXML and why didn't Microsoft just work on ODF in collaboration instead of creating a new, bloated standard. Bill's answer was quite surprising, as he clarified that the file format (OOXML) was a part of the software and that OOXML and the software (MS Office) are quite inseparable. Ergo, OOXML is an integral and inseparable part of MS Office. That's why they could not adopt ODF as the file format for subsequent versions of MS Office. So all the rumours that OOXML is nothing but a dump of Office2007 and not an international, free and open standard are now confirmed by a MS spokesman. In the run-up of the decision whether or not EOOXML should take the ISO fast track, MS tried to convince the National Bodies that they are not allowed to vote against EOOXML because EOOXML could physically exist next to ODF (succeeding with the US NB), see Rick Jelliffe's and Brian Jones' blogs. This campaign tried to confuse the technical bodies with an unreasonable strict technical definition of a contradiction, ignoring the fact that this phase is intended to identify obstacles to trade (monopolies) and violations of international trade rules as is explained by Marbux. The campaign even became comical, see Open Malaysia:Microsoft's Definition of Contradictions and The Art of Rewriting History. It didn't work that well, given that many countries filed objections, see Andy Updegrove's blog post and his

comments on the actual responses. In the end, MS seem to just buy their way to an ISO standard by swamping the voting members with their employees. So MS will have a majority by making sure that most voting individuals are on their payroll. (On a personal, opinionated note: What is the worth of a voting system where the majority of the voters get sacked if they vote against a single entity) [edit]

Licensing MS EOOXML is advertised as an "Open" standard by Microsoft. So it is expected that the license for it's use will at least match the openness of ODF and PDF. Two questions will be asked by any prospective user: 1. Can someone stop me if I write and distribute an application that uses this standard? 2. Under what conditions can I use this standard? For ODF and PDF the answers are, respectively, Noone (1) and some conditions on the use of the name PDF (2). How is this for EOOXML? Microsoft has written the standard and currently has the only working implementation of EOOXML. Therefore, MS are the only ones who know what copyrights and patents must be licensed from MS and third parties to implement EOOXML. But as of January 2007, Microsoft have consistently refused to identify the copyrights and patents that must be licensed to implement EOOXML. The language used by MS in the EOOXML licenses and "covenants not to sue" is so intricate (and peculiar), that many people still doubt whether it really allows anyone but Microsoft to implement EOOXML. Microsoft has changed the licenses for EOOXML during the years. The initial offer for licensing was seriously flawed as of March 2005. In December 2005, there were still major worries about the pledges not to sue by Microsoft and the ECMA terms of reference. But as late as the start of 2007 there were still doubts whether it would be legal to implement the standard in a meaningful way. To quote the conclusion of Analyzing the Microsoft Office Open XML License: In this way, the License is stated and is to be perceived as a threat rather than a promise. In effect it says 'Stay away! Microsoft is the only entity which may implement the Microsoft Office Open XML formats!' This is a fundamental contradiction of the purpose of an open standard. In the comments section of this blog, Marbux remarks that the peculiar language chosen for the EOOXML license makes him conclude that But as a legal foundation for building apps that can take thousands of person-hours, this covenant not to sue is legal quicksand of unknown depth. Or, as Andy Updegrove puts it: And taking that concern a step further, consider the fact that OOXML also apparently violates section 2.14 of the ISO/IEC Directives, Part 1, in that not all of what it takes to implement OOXML appears to be covered by Microsoft's patent pledge, in two respects. First, the pledge does not explicitly cover material that is referenced, but not included in the specification, and second, the Microsoft patent commitment does not cover optional features. Sections of

OOXML that are not fully described include those that require compliant implementations to mimic the behavior of Microsoft products, such as those products and capabilities referred to above (OLE, etc.) Microsoft will need to clarify whether its patent commitment will in fact extend to these requirements. Potentially, these concerns would involve large portions of OOXML, in contradiction of the ISO/IEC requirement that more than a bare-bones implementation must be permitted without fear of infringement. Most of this is also discussed in Searching for Openness in Microsoft's OOXML and Finding Contradictions and the GL EOOXML objections project page. There is also a Microsoft commissioned evaluation of the license by Baker and Mackenzie from 2006. See, eg, these discussions on GL and the Grokdoc Talk:Objections page. Basically, the Baker and Mackenzie does not address any of the criticisms leveled against the two licenses: Covenant Not to Sue (CNS) and the Open Standards Patent (OSP) license. The report has some careful choice of words, but nowhere does it state that a blanket patent license is given for implementing the EOOXML specifications in full. This all can lead to rather comical dialogs with MS legal representatives as was exemplified in this OpenMalaysia blog Billions of Documents. At a SIRIM TC4 meeting on ECMA 376, Microsoft was represented by Stephen Mutkoski (a lawyer). A member of the technical committee asks a simple question: They sent a lawyer to a Technical Committee briefing. Okay, perhaps we could get more legal information then. ... So if Macros are not included in Ecma 376, will developers who develop it independently get sued?" "I will have to get back to you ...” To summarize the licensing problems, the answers to the above questions for your future EOOXML compliant software can be provisionally given as: 1. Microsoft can stop any attempt to distribute your application 2. You need permission from Microsoft for every application of EOOXML on a computer [edit] (In-)Compatibility with other standards MS wants its own XML format to be an ISO standard. However, MS' format does not conform to many other ISO or W3C standards. You might even think MS doesn't like the W3C ;-): See eg, Wikipedia, OpenDocument Fellowship, Open Malaysia: MSOOXML's disregard for existing standards and, of course, Bob Sutor's blog. See also this GL discussion: Again from the newspick: a description of why ODF and OOXML don't interoperate. Office Open XML unquestionably duplicates or at least significantly overlaps with the ODF specification; moreover, unlike Office Open XML, OpenDocument incorporates still other standards such as XPath, XLinks, SVG, XForms, and MathML. Office Open XML reinvents the wheel at every turn rather than relying on existing open standards. The failure to implement XPath in Office Open XML is particularly problematic; it makes full fidelity in

automated XSL transformations to and from other XML formats next to impossible. That problem creates a contradiction in the ISO sense; full interoperability between ODF and EOOXML applications is infeasible. According to the Wikipedia Xpath is the following: XPath (XML Path Language) is an expression language for addressing portions of an XML document, or for computing values (strings, numbers, or boolean values) based on the content of an XML document. The XPath language is based on a tree representation of the XML document, and provides the ability to navigate around the tree, selecting nodes by a variety of criteria. In popular use (though not in the official specification), an XPath expression is often referred to simply as an XPath. Originally motivated by a desire to provide a common syntax and behavior model between XPointer and XSLT, XPath has rapidly been adopted by developers as a small query language. I gather that if OOXML do not implement Xpath, then documents in this format cannot be queried using normal XML tools. For example Wikipedia says the following on XSLT. XSLT is a specific kind of template processor primarily designed to "transform" XML documents into other XML documents. The original document is not changed; rather, a new document is created based on the content of an existing one.[3] The new document may be serialized (output) by the processor in standard XML syntax or in another format, such as HTML or plain text.[4] XSLT is most often used to convert data between different XML schemas or to convert XML data into HTML or XHTML documents for web pages, or into an intermediate XML format that can be converted to PDF document [snip] XSLT relies upon the W3C's XPath language for identifying subsets of the source document tree, as well as for performing calculations. XPath also provides a range of functions, which XSLT itself further augments. This reliance upon XPath adds a great deal of power and flexibility to XSLT. What strikes me of such tactics is they are borderline on misrepresentation. When a supplier says he is using XML, most IT managers will understand a reasonably complete suite of XML related standards will be used to generate the full benefits of XML. By silently picking and choosing which standards in the XML suite they implement, Microsoft breaks this assumption without informing its customers. Open Malaysia has a very nice writeup on the VML (non-)deprecation in MS EOOXML Is VML in or out now, or was that a typo?. So: * 1. VML is included for backwards compatibility reasons only. * 2. DrawingML is newer and richer and designed to replace VML. * 3. VML is deprecated and only included for legacy reasons * 4. New applications are strongly encouraged to use DrawingML instead This simply begs these questions: * 1. Why then is Section 2.3.1 explicitly using VML? * 2. Where are the instructions for using DrawingML instead? * 3. If DrawingML is richer and

designed to replace VML, why have VML in the first place? * 4. I would take it that Office 2007 is a "new application" and should use DrawingML instead of VML. Does it? What is extra interesting is the long first comment from Stephane Rodriguez who explains that VML was implemented to lock the internet, IE, to MS Office. So the Office team at Microsoft could not manage to get rid of VML. It is possible, unless they intentionally use it as a lock-in tool, that next version of Office, codenamed Office 14, will be the first one to have an Office-wide DrawingML implementation. Until then, Office 2007 is at odds with the specs that Microsoft is pushing and as a result, it is not a reference implementation of the specs! In other words, since there cannot be a non-Microsoft implementation of the specs (it will take at least ten years for a company starting now, and it will never achieve 100% fidelity since many things are missing in the specs), it follows that there is simply NO reference implementation out there! Quite amazing... Standards flouted in MS EOOXML (see also Rob Weir's ooocon2006 presentation and Andy Updegrave's The Contradictory State of OOOXML): * Codes for the Representation of Names and Languages ISO 639 * Computer Graphics Metafile ISO/IEC 8632 * XLink W3C * XForms W3C * XPath W3C * SVG W3C * MathML W3C * SMIL W3C * Gregorian Calendar ISO 8601 (EOOXML redefines leap years and uses two start dates for counting, 1900 and 1904, see also Brian Jones' apology blaming the bug on a programming shortcut in Lotus 1-2-3.) The 1900 leap year bug is an excellent illustration of how Microsoft treats standards as documentation of their code binaries, including all legacy bugs. Other links * The Future of Lock-in * Game Time for OpenDocument * Searching for Openness in Microsoft's OOOXML and Finding Contradictions * Deadline Looms to Express Concerns about ECMA 376 Office Open XML * Standardizing away the world's languages * Cum mortuis in lingua mortua (SVG/VML) * OOOXML has poor XML Element names [edit] Office2007 implementation At the start of 2007, only Office 2007 implements EOOXML. However, it is reported that Office2007 does prefer a binary format after all. Allegedly, for performance reasons. This GL comment says it all (see also this continuation) Checking the Rob Weir blog I notice that MS Office 2007 is not using OOOXML after all. There is yet another binary format that is silently introduced and touted as the preferred option. Rob Weir says: It is also interesting that Microsoft is positioning this format as the preferred one for performance and interoperability. The online help for Excel 2007 says: In addition to the new XML-based file formats, Office Excel 2007 also introduces a binary version of the segmented compressed file format for large or complex workbooks. This file format, the Office Excel 2007 Binary (or BIFF12) file format (.xls), can be used for optimal performance and backward

compatibility. The Gary Edwards blog (from the newspick) posted another finding of Rob Weir that I wasn't able to locate on his blog. Another interesting point, courtesy of the inexhaustible Rob Weir, is that MSOffice 2007 has the unique ability to produce two kinds of EooXML. I've never seen an application do this before, and one has to wonder why? What Rob discovered is that if you import a legacy BoB into MSOffice 2007, the application will convert it to EooXML fully preserving the originating application binary encodings \u2013 even doing so within laughably and descriptively colorful named XML tags. Fine. We can easily do that with ODF using the infamous tag model. No inadequacy to be found here. (Damn, if only we had patented that technique. Phil Boutros must be lapping this up :) One of the examples Rob pointed out is the use of the long since deprecated VRM encoding. Good work MSOffice 2007! Next Rob re created that same legacy document \u201cnatively\u201d in MSOffice 2007. Exactly the same! Saved it as EooXML. Then examined the XML, comparing the two EooXML files. Well well well. They are substantially different! Same application. Same file format. Same document content and presentation. Different EooXML!

Interestingly, for one thing there is no VRM encoding. It's been replaced by the proprietary application/platform dependent but forward Vista ready DrawingML. Some will argue that this is the only way to preserve backward compatibility. I would argue that this will result in an information nightmare. Only one of the EooXML files is backwards compatible. The other is ready for the Vista bound information processing chain centered on the Exchange/SharePoint Hub. How are organizations going to keep things straight? How can someone interoperate with Office 2007? People will have to sort out which of the ever changing file format is being produced. ISO standardisation looks pretty much like a decoy. It can be used (if at all) to send information in the MS Office suite but it will never get out. Governments that want standards for sovereignty purposes will get a "standard" but not the sovereignty. Here is Bob Sutor's opinion from We have proprietary extensions to Microsoft Office Open XML already. Here\u2019s an idea of how things are already reverting to the same old behavior, right when Microsoft is trying to convince the ISO how wonderful for interoperability their spec is supposed to be. One point being made in several places, eg, in MS Office 2007 is not using OOXML, is that Visual Basic macros in Excel (VBA) are stored in a binary (unreadable) form in EOOXML (they are not described in the standard). That is, the ASCII VB macros cannot be exported to another application using EOOXML. An anonymous comment in this blog claims that VBA macros are Excel internal and have no use outside. But other applications are implementing VB too, so that argument is incorrect. To summarize, MS warn users to not use

EOOXML to store a large spreadsheet because of bad performance and that EOOXML cannot represent all information in Excel2007. These posts also suggest that a lot of the attacks on ODF, eg, bad performance on large spreadsheets (and here) and inability to represent all of MS Office features, were pre-emptive strikes to divert from the shortcomings of EOOXML itself. (and some find OO.o is faster than MS Office) [edit] Alternative Implementations As far as I know, this might be the first ISO standard that fully implements just a single product of such horrible complexity (running over 6000 pages). It costs MS themselves an estimated 150 work years to implement their own standard. However, this was later qualified by Andrew Shebanow after a response from Rick Schaut with a different set of statistics. But even after all numbers juggling, it is still not clear whether other groups can implement the exact same product, and if they can, how much time this will take. According to How to hire Guillaume Portes by Rob Weir, it is clear that Microsoft withholds essential information to fully implement EOOXML. For a more comprehensive comparison between EOOXML and ODF, see ODF/OOXML technical white paper. 'Rumours' have it that MS EOOXML is just a serialized, packaged memory dump of the internal Office data structures. As Rob Weir puts it: The astute reader will notice that this is pretty much a bit-for-bit dump of the Windows SDK memory structure. In this case the file format specification provides no abstraction or generalization. It merely is a memory dump of a Windows data structure. Bill Hilf has meanwhile confirmed these rumours as reported by the Open Malaysia blog. A good standard does contain features that help converting documents from legacy products. But it does not require a reimplementaion in the standard of all legacy formats. A good illustration how far removed EOOXML is from a real standard is given in the above mentioned How to hire Guillaume Portes by Rob Weir. A choice quote from Rob Weir, after reproducing the requirements for Word 95's spacing compatibility "between full-width East Asian characters in a document's content": What should we make of that? Not only must an interoperable OOXML application support Word 12's style of spacing, but it must also support a different way of doing it in Word 95. And by the way, Microsoft is not going to tell you how it was done in Word 95, even though they are the only ones in a position to do so. This aspect of EOOXML is consistent with the fact that MS EOOXML seems to be a memory dump of Office internal data structures. It can be imagined that MS Office stores it's own formating information in internal data structures, but uses hooks into legacy code, bugs included, to generate older formats. Legacy formats Microsoft might not know how to recreate themselves anymore. So when dumping it's internal data to file, it inserts these hooks into the XML to refer to

these legacy code fragments. How anyone without these legacy code fragments could re-implement their behavior is beyond my comprehension. Maybe someone can enlighten me about this. In his blog, Brian Jones answers some of the points of Rob Weir and accuses ODF from having unspecified elements too. But read the comments on his blog about what questions Brian does not answer (and never answers, see this GL post). Brian Jones seem to confuse unspecified formatting elements in EOOXML that affect the layout of the document with unspecified application internal settings, eg, menu bar placement, in ODF. It is clear that the latter are not intended to be portable. Moreover, Brian Jones seems to confuse OpenOffice.org with the ODF standard. For instance, when he complains that OpenOffice.org has a config setting indicating legacy line-spacing. But this config setting is definitely not part of the ODF standard. Rob Weir discusses the lack of distance between OOXML and MS Office 2007 in Essential and Accidental in Standards where he concludes: It seems to me is that OOXML in fact does have application-dependent behaviors, but only for Microsoft Office, and that Microsoft has hard-coded these application-dependent behaviors into the XML schema, without tolerance or allowance for any other implementations settings. Something does not cease to be application-dependent just because you write it down. It ceases to be application-dependent only when you generalize it and accommodate the needs of more than one application. The inclusion of application config settings into the document standard on an equal footing strengthens the picture that projects EOOXML as a semi-automatic dump of the internal data structures of MS Office 2007. (on a personal note, it find it revealing that a very experienced MS developer like Brian Jones confuses a standard with the config options of an application) In short, EOOXML contains a lot of distinct legacy formats. This point is made very clearly in another of Rob Weir's blog posts Calling Captain Kirk: The OOXML specification, at 6,000+ pages has now just sucked in the complexity of one or more versions of HTML, MHTML, RTF and WordProcessingML. It requires that a conformant application understand these formats, but forbids a conformant application from producing them. This is another example of how you never know what you're getting when you get an OOXML file. To support OOXML is not to support a single format, or even a single family of formats. To fully support OOXML requires that you support OOXML plus a motley hodgepodge of various other formats, deprecated, abandoned and proprietary. The cost of compatibility with billions of legacy Microsoft documents is that you must support their legacy of years of false starts and restarts in the file format arena. Also Andy Updegrave's blog post The Contradictory State of OOXML refers to these proprietary legacy components in

OOXML: Other parts of OOXML refer to OLE, macros/scripts, encryption and DRM \u2013 none of which are fully described. Nor has Microsoft stated whether necessary information will be supplied on a non-discriminatory basis to all (or at all). Stephane Rodriguess explains in a comment to Open Malaysia how the OLE in MS EOOXML is platform bound There is a reason why Microsoft does not document this stuff. They would have to give the documentation of OLE, which in turn would show clearly as in water that this stuff is platform-dependent : Windows. At some point, MS started to drum up "Representation" as the basic value of MS EOOXML, see Rob Weir's No representation without specification. This representation thing can be summarized as EOOXML is like a street directory without a map. It represents each address, but won't help you to find it. At this point, I am starting to seriously doubt whether even Microsoft could reimplement EOOXML from scratch."

Added:

<http://www.groklaw.net/article.php?story=20070720073215943>

We want control of Documents - and not to be controlled by Microsoft. Sovereign status of a state or commonwealth must be a priority...! Read below and understand how this affects MA and individuals.

"Finally, I want to control my own documents. I wrote them, and I wish to control them. This is the part I hope Massachusetts thinks about carefully. An important goal of government is to preserve documents so they don't become inaccessible to the public. Proprietary extensions by definition slam that door in your face, because you then lose control over your own documents. You can never have access now except through Microsoft, and if you think that company is going to be around in fifty or 100 years, you need to ask: are you positive? Can you guarantee it? And even if they are, whose documents are they now? Yours? Or Microsoft's? Who controls access?

If your goal is to avoid lock-in to a single vendor, then proprietary extensions should scare you silly. It doesn't matter then how many companies use the format or how many business partners want it or even if it is a de facto standard -- you are now dependent on one single vendor. That unhappy fate is precisely what ODF, and only ODF, can prevent.

So, why not just bite the bullet, merge ODF with Ecma-376, and make it possible for everyone to interoperate freely as we already can in email? I can send an email to my friends from my Linux computer or my Mac and they can still read it just fine, even if they do use Windows and love HTML email. I remember [Eric Kriss](#)

[told ComputerWorld](#) why not:

He said technical people at Microsoft told him it would be “trivial” to add support for ODF to the new Office 2007. The resistance to doing so came from the vendor’s business side, according to Kriss...."

So - Microsoft thinks that ODF and "Open Standards" are NOT agreeable to their business plan.

If you notice the dance that Microsoft is doing all over the world... it is to exclude and destroy any open standard that everyone can use (as it not in the best interest of Microsoft's balance sheet to have an open solution)!

See the following articles and the comments that follow as well:

- [Proprietizing Standards](#), 10:25 AM <http://www.groklaw.net/article.php?story=20070720073215943>
- [Notes from Portugal on the July 16th Meeting on Ecma-376](#), Wednesday 05:18 PM <http://www.groklaw.net/article.php?story=2007071812280798>

Thank-you!

Building a website is a piece of cake.

Yahoo! Small Business gives you [all the tools to get online](#).

From: [GrokLaw OnceOnly](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Amended: Enterprise Technical Reference Model v. 4.0 Public Review Draft (added Groklaw 07-20-2007 info at end)
Date: Friday, July 20, 2007 5:10:49 PM
Attachments:

See:

"Questions for Microsoft on open formats " at
<http://news.bbc.co.uk/1/hi/technology/6291124.stm>

and please... do not include the Microsoft "not-open" OOXML format in the Enterprise Technical Reference Model v. 4.0 -

Microsoft's use of the word "open" is a sham and one has to question if it is or is not an outright lie in order to twist the weak minds of some into thinking that Microsoft's formats are open.

Read Microsoft's dirty tricks url below to see how Microsoft acts with others and standards. You can not change those Microsoft Monoploy based formats in to spots of a different color (the MS formats are not OPEN at all). Support -only the ISO Open Document Format (ODF) as this is the only truely open format... that has been developed by a group of individuals, education folks, business folks for it to be a usable format for the next 200 plus years. Reject - the Microsoft OOXML fomate one is a marketing play on words that is solely owned and developed by only Microsoft! The Microsoft business strategy is to NOT have a long lasting standard format, instead Microsoft's formats are now and have been designed as only a Microsoft ONLY usable format (the is a format that you know they must change to make the commonweath upgrade it's software to a newer format in the future). If you didn't have to change formats you would not have to upgrade. So, over the next 200 years will ISO ODF be a lower cost solution - Of course it will be - because it is also a "free to use" format that is designed to last a user 200 years and longer. Microsoft does not want the commonwealth not to pay them money to upgrade... they want the money paid every 3-4 years for the next new format they will invent for one reason (only to make money for Microsoft). How

many times do we need to buy another word processor... with ODF it will be never as software like OpenOffice.org is free to use... just ask the country of FRANCE as their tax department is using OpenOffice.org and ODF on about 80,000 computer (works on Windows, Linux, and Apple computers freely). If you would like information on how Microsoft plays (or does not play fairly)...

See:

http://www.grokdoc.net/index.php/Microsoft%27s_Standards_History
and

http://www.grokdoc.net/index.php/Dirty_Tricks_history

in this section you can read all about: " MS OfficeOpenXML MS' answer to ISO Open Document Format. OfficeOpenXML is an ECMA standard, Ecma-376, that implements MS Office 2007 (note, MS Office does not follow or implement the standard, it is the other way round). MS has played as dirty as they could to fight ODF. Just browse Consortium Info, Walt Hucks' blog, or Groklaw's ODF/XML page and follow the links for the story of ODF in Massachusetts and EOOXML in general. A quote from James Love on participants of the "Internet Governance Forum" on open standards: Many people are nervous about these issues, because Microsoft is investing millions to defeat them, and to attack personally government officials who Microsoft sees as too friendly to open standards, and to reward politicians and government officials who back Microsoft. This is no empty threat. Look at the story of Peter Quin, a government official who dared to back ODF. It is rather common to encounter cynicism with respect to Microsofts' intentions with the standardization efforts around EOOXML. EOOXML needs ISO approval to be eligible for governments bids because "Governments worldwide mandate that only internationally agreed open standards are acceptable when creating documents". A good example of the common feeling is found in Six thousand pages, one month, no chance...: Its preferred answer is to create its own open document format - OOXML - which can then be recognised as such by the international standards bodies. However, it does not want this to be something that its competitors can adopt freely. The answer is to game the system. As part of this, the company has created (by itself, unlike Open Doc) a proposal for OOXML that is six thousand pages long, and then put it into the fast-track approval system with very minimal time for discussion and objection. GrokDoc has a page to file EOOXML objections to the ISO fast track procedure and two Groklaw articles explaining it, Searching for Openness in Microsoft's OOXML and Finding Contradictions and Deadline Looms to Express Concerns about ECMA 376 Office Open XML, with the usual plethora of insightful comments. For a quick

comparison of ODF and EOOXML, see Rob Weir's OpenOffice.org Conference 2006 presentation. This also goes into performance questions. A more extensive comparison is given by The Open Document Fellowship, both in general terms and in more technical terms. Sam hiser has written an excellent summary of the differences in "usability" of the standards *Achieving Openness: a closer look at ODF & OOXML*, a must read for the arguments. The ODF standard was designed with (legacy versions of) MS Office documents in mind. In contrast, EOOXML was not developed as a standard, but as a description of MS Office 2007, without regard to anyone else (see this historical comment on the mindset of MS developers). Therefore, EOOXML implements mostly a subset of what is possible under ODF. This history is explained in a Groklaw comment by Garry Edwards. In short, MS claims EOOXML is needed because ODF cannot represent all legacy MS Office formats and is inefficient. The ODF "camp" has created the Da Vinci converter plugin and claims 100% round-trip fidelity between ODF and the last MS Office binary formats. Furthermore, this plugin also proves the efficiency of the ODF format. Note that the final release of MS Office 2007 mysteriously broke the plug-ins as discussed by Dana Blankenhorn in *Microsoft playing three card monte with XML conversion*. We learn the real reason MS couldn't standardize on ODF from Bill Hilf of MS himself, as recorded by Dinesh Nair in the *Open Malaysia* blog: What got really interesting was when Yusseri raised the issue of OOXML and why didn't Microsoft just work on ODF in collaboration instead of creating a new, bloated standard. Bill's answer was quite surprising, as he clarified that the file format (OOXML) was a part of the software and that OOXML and the software (MS Office) are quite inseparable. Ergo, OOXML is an integral and inseparable part of MS Office. That's why they could not adopt ODF as the file format for subsequent versions of MS Office. So all the rumours that OOXML is nothing but a dump of Office 2007 and not an international, free and open standard are now confirmed by a MS spokesman. In the run-up of the decision whether or not EOOXML should take the ISO fast track, MS tried to convince the National Bodies that they are not allowed to vote against EOOXML because EOOXML could physically exist next to ODF (succeeding with the US NB), see Rick Jelliffe's and Brian Jones' blogs. This campaign tried to confuse the technical bodies with an unreasonable strict technical definition of a contradiction, ignoring the fact that this phase is intended to identify obstacles to trade (monopolies) and violations of international trade rules as is explained by Marbut. The campaign even became comical, see *Open Malaysia: Microsoft's Definition of Contradictions* and *The Art of Rewriting History*. It didn't work that well, given that many countries filed objections, see Andy Updegrave's blog post and his

comments on the actual responses. In the end, MS seem to just buy their way to an ISO standard by swamping the voting members with their employees. So MS will have a majority by making sure that most voting individuals are on their payroll. (On a personal, opinionated note: What is the worth of a voting system where the majority of the voters get sacked if they vote against a single entity) [edit]

Licensing MS EOOXML is advertised as an "Open" standard by Microsoft. So it is expected that the license for it's use will at least match the openness of ODF and PDF. Two questions will be asked by any prospective user: 1. Can someone stop me if I write and distribute an application that uses this standard? 2. Under what conditions can I use this standard? For ODF and PDF the answers are, respectively, Noone (1) and some conditions on the use of the name PDF (2). How is this for EOOXML? Microsoft has written the standard and currently has the only working implementation of EOOXML. Therefore, MS are the only ones who know what copyrights and patents must be licensed from MS and third parties to implement EOOXML. But as of January 2007, Microsoft have consistently refused to identify the copyrights and patents that must be licensed to implement EOOXML. The language used by MS in the EOOXML licenses and "covenants not to sue" is so intricate (and peculiar), that many people still doubt whether it really allows anyone but Microsoft to implement EOOXML. Microsoft has changed the licenses for EOOXML during the years. The initial offer for licensing was seriously flawed as of March 2005. In December 2005, there were still major worries about the pledges not to sue by Microsoft and the ECMA terms of reference. But as late as the start of 2007 there were still doubts whether it would be legal to implement the standard in a meaningful way. To quote the conclusion of Analyzing the Microsoft Office Open XML License: In this way, the License is stated and is to be perceived as a threat rather than a promise. In effect it says 'Stay away! Microsoft is the only entity which may implement the Microsoft Office Open XML formats!' This is a fundamental contradiction of the purpose of an open standard. In the comments section of this blog, Marbux remarks that the peculiar language chosen for the EOOXML license makes him conclude that But as a legal foundation for building apps that can take thousands of person-hours, this covenant not to sue is legal quicksand of unknown depth. Or, as Andy Updegrove puts it: And taking that concern a step further, consider the fact that OOXML also apparently violates section 2.14 of the ISO/IEC Directives, Part 1, in that not all of what it takes to implement OOXML appears to be covered by Microsoft's patent pledge, in two respects. First, the pledge does not explicitly cover material that is referenced, but not included in the specification, and second, the Microsoft patent commitment does not cover optional features. Sections of

OOXML that are not fully described include those that require compliant implementations to mimic the behavior of Microsoft products, such as those products and capabilities referred to above (OLE, etc.) Microsoft will need to clarify whether its patent commitment will in fact extend to these requirements. Potentially, these concerns would involve large portions of OOXML, in contradiction of the ISO/IEC requirement that more than a bare-bones implementation must be permitted without fear of infringement. Most of this is also discussed in Searching for Openness in Microsoft's OOXML and Finding Contradictions and the GL EOOXML objections project page. There is also a Microsoft commissioned evaluation of the license by Baker and Mackenzie from 2006. See, eg, these discussions on GL and the Grokdoc Talk:Objections page. Basically, the Baker and Mackenzie does not address any of the criticisms leveled against the two licenses: Covenant Not to Sue (CNS) and the Open Standards Patent (OSP) license. The report has some careful choice of words, but nowhere does it state that a blanket patent license is given for implementing the EOOXML specifications in full. This all can lead to rather comical dialogs with MS legal representatives as was exemplified in this OpenMalaysia blog Billions of Documents. At a SIRIM TC4 meeting on ECMA 376, Microsoft was represented by Stephen Mutkoski (a lawyer). A member of the technical committee asks a simple question: They sent a lawyer to a Technical Committee briefing. Okay, perhaps we could get more legal information then. ... So if Macros are not included in Ecma 376, will developers who develop it independently get sued?" "I will have to get back to you ...” To summarize the licensing problems, the answers to the above questions for your future EOOXML compliant software can be provisionally given as: 1. Microsoft can stop any attempt to distribute your application 2. You need permission from Microsoft for every application of EOOXML on a computer [edit] (In-)Compatibility with other standards MS wants its own XML format to be an ISO standard. However, MS' format does not conform to many other ISO or W3C standards. You might even think MS doesn't like the W3C ;-): See eg, Wikipedia, OpenDocument Fellowship, Open Malaysia: MSOOXML's disregard for existing standards and, of course, Bob Sutor's blog. See also this GL discussion: Again from the newspick: a description of why ODF and OOXML don't interoperate. Office Open XML unquestionably duplicates or at least significantly overlaps with the ODF specification; moreover, unlike Office Open XML, OpenDocument incorporates still other standards such as XPath, XLinks, SVG, XForms, and MathML. Office Open XML reinvents the wheel at every turn rather than relying on existing open standards. The failure to implement XPath in Office Open XML is particularly problematic; it makes full fidelity in

automated XSL transformations to and from other XML formats next to impossible. That problem creates a contradiction in the ISO sense; full interoperability between ODF and EOOXML applications is infeasible. According to the Wikipedia XPath is the following: XPath (XML Path Language) is an expression language for addressing portions of an XML document, or for computing values (strings, numbers, or boolean values) based on the content of an XML document. The XPath language is based on a tree representation of the XML document, and provides the ability to navigate around the tree, selecting nodes by a variety of criteria. In popular use (though not in the official specification), an XPath expression is often referred to simply as an XPath. Originally motivated by a desire to provide a common syntax and behavior model between XPointer and XSLT, XPath has rapidly been adopted by developers as a small query language. I gather that if OOXML do not implement XPath, then documents in this format cannot be queried using normal XML tools. For example Wikipedia says the following on XSLT. XSLT is a specific kind of template processor primarily designed to "transform" XML documents into other XML documents. The original document is not changed; rather, a new document is created based on the content of an existing one.[3] The new document may be serialized (output) by the processor in standard XML syntax or in another format, such as HTML or plain text.[4] XSLT is most often used to convert data between different XML schemas or to convert XML data into HTML or XHTML documents for web pages, or into an intermediate XML format that can be converted to PDF document [snip] XSLT relies upon the W3C's XPath language for identifying subsets of the source document tree, as well as for performing calculations. XPath also provides a range of functions, which XSLT itself further augments. This reliance upon XPath adds a great deal of power and flexibility to XSLT. What strikes me of such tactics is they are borderline on misrepresentation. When a supplier says he is using XML, most IT managers will understand a reasonably complete suite of XML related standards will be used to generate the full benefits of XML. By silently picking and choosing which standards in the XML suite they implement, Microsoft breaks this assumption without informing its customers. Open Malaysia has a very nice writeup on the VML (non-)deprecation in MS EOOXML Is VML in or out now, or was that a typo?. So: * 1. VML is included for backwards compatibility reasons only. * 2. DrawingML is newer and richer and designed to replace VML. * 3. VML is deprecated and only included for legacy reasons * 4. New applications are strongly encouraged to use DrawingML instead This simply begs these questions: * 1. Why then is Section 2.3.1 explicitly using VML? * 2. Where are the instructions for using DrawingML instead? * 3. If DrawingML is richer and

designed to replace VML, why have VML in the first place? * 4. I would take it that Office 2007 is a "new application" and should use DrawingML instead of VML. Does it? What is extra interesting is the long first comment from Stephane Rodriguez who explains that VML was implemented to lock the internet, IE, to MS Office. So the Office team at Microsoft could not manage to get rid of VML. It is possible, unless they intentionally use it as a lock-in tool, that next version of Office, codenamed Office 14, will be the first one to have an Office-wide DrawingML implementation. Until then, Office 2007 is at odds with the specs that Microsoft is pushing and as a result, it is not a reference implementation of the specs! In other words, since there cannot be a non-Microsoft implementation of the specs (it will take at least ten years for a company starting now, and it will never achieve 100% fidelity since many things are missing in the specs), it follows that there is simply NO reference implementation out there! Quite amazing... Standards flouted in MS EOOXML (see also Rob Weir's ooocon2006 presentation and Andy Updegrave's The Contradictory State of OOOXML): * Codes for the Representation of Names and Languages ISO 639 * Computer Graphics Metafile ISO/IEC 8632 * XLink W3C * XForms W3C * XPath W3C * SVG W3C * MathML W3C * SMIL W3C * Gregorian Calendar ISO 8601 (EOOXML redefines leap years and uses two start dates for counting, 1900 and 1904, see also Brian Jones' apology blaming the bug on a programming shortcut in Lotus 1-2-3.) The 1900 leap year bug is an excellent illustration of how Microsoft treats standards as documentation of their code binaries, including all legacy bugs. Other links * The Future of Lock-in * Game Time for OpenDocument * Searching for Openness in Microsoft's OOOXML and Finding Contradictions * Deadline Looms to Express Concerns about ECMA 376 Office Open XML * Standardizing away the world's languages * Cum mortuis in lingua mortua (SVG/VML) * OOOXML has poor XML Element names [edit] Office2007 implementation At the start of 2007, only Office 2007 implements EOOXML. However, it is reported that Office2007 does prefer a binary format after all. Allegedly, for performance reasons. This GL comment says it all (see also this continuation) Checking the Rob Weir blog I notice that MS Office 2007 is not using OOOXML after all. There is yet another binary format that is silently introduced and touted as the preferred option. Rob Weir says: It is also interesting that Microsoft is positioning this format as the preferred one for performance and interoperability. The online help for Excel 2007 says: In addition to the new XML-based file formats, Office Excel 2007 also introduces a binary version of the segmented compressed file format for large or complex workbooks. This file format, the Office Excel 2007 Binary (or BIFF12) file format (.xls), can be used for optimal performance and backward

compatibility. The Gary Edwards blog (from the newspick) posted another finding of Rob Weir that I wasn't able to locate on his blog. Another interesting point, courtesy of the inexhaustible Rob Weir, is that MSOffice 2007 has the unique ability to produce two kinds of EooXML. I've never seen an application do this before, and one has to wonder why? What Rob discovered is that if you import a legacy BoB into MSOffice 2007, the application will convert it to EooXML fully preserving the originating application binary encodings \u2013 even doing so within laughably and descriptively colorful named XML tags. Fine. We can easily do that with ODF using the infamous tag model. No inadequacy to be found here. (Damn, if only we had patented that technique. Phil Boutros must be lapping this up :) One of the examples Rob pointed out is the use of the long since deprecated VRM encoding. Good work MSOffice 2007! Next Rob re created that same legacy document \u201cnatively\u201d in MSOffice 2007. Exactly the same! Saved it as EooXML. Then examined the XML, comparing the two EooXML files. Well well well. They are substantially different! Same application. Same file format. Same document content and presentation. Different EooXML! Interestingly, for one thing there is no VRM encoding. It's been replaced by the proprietary application/platform dependent but forward Vista ready DrawingML. Some will argue that this is the only way to preserve backward compatibility. I would argue that this will result in an information nightmare. Only one of the EooXML files is backwards compatible. The other is ready for the Vista bound information processing chain centered on the Exchange/SharePoint Hub. How are organizations going to keep things straight? How can someone interoperate with Office 2007? People will have to sort out which of the ever changing file format is being produced. ISO standardisation looks pretty much like a decoy. It can be used (if at all) to send information in the MS Office suite but it will never get out. Governments that want standards for sovereignty purposes will get a "standard" but not the sovereignty. Here is Bob Sutor's opinion from We have proprietary extensions to Microsoft Office Open XML already. Here\u2019s an idea of how things are already reverting to the same old behavior, right when Microsoft is trying to convince the ISO how wonderful for interoperability their spec is supposed to be. One point being made in several places, eg, in MS Office 2007 is not using OOXML, is that Visual Basic macros in Excel (VBA) are stored in a binary (unreadable) form in EOOXML (they are not described in the standard). That is, the ASCII VB macros cannot be exported to another application using EOOXML. An anonymous comment in this blog claims that VBA macros are Excel internal and have no use outside. But other applications are implementing VB too, so that argument is incorrect. To summarize, MS warn users to not use

OOXML to store a large spreadsheet because of bad performance and that EOOXML cannot represent all information in Excel2007. These posts also suggest that a lot of the attacks on ODF, eg, bad performance on large spreadsheets (and here) and inability to represent all of MS Office features, were pre-emptive strikes to divert from the shortcomings of EOOXML itself. (and some find OO.o is faster than MS Office) [edit] Alternative Implementations As far as I know, this might be the first ISO standard that fully implements just a single product of such horrible complexity (running over 6000 pages). It costs MS themselves an estimated 150 work years to implement their own standard. However, this was later qualified by Andrew Shebanow after a response from Rick Schaut with a different set of statistics. But even after all numbers juggling, it is still not clear whether other groups can implement the exact same product, and if they can, how much time this will take. According to How to hire Guillaume Portes by Rob Weir, it is clear that Microsoft withholds essential information to fully implement EOOXML. For a more comprehensive comparison between EOOXML and ODF, see ODF/OOXML technical white paper. 'Rumours' have it that MS EOOXML is just a serialized, packaged memory dump of the internal Office data structures. As Rob Weir puts it: The astute reader will notice that this is pretty much a bit-for-bit dump of the Windows SDK memory structure. In this case the file format specification provides no abstraction or generalization. It merely is a memory dump of a Windows data structure. Bill Hilf has meanwhile confirmed these rumours as reported by the Open Malaysia blog. A good standard does contain features that help converting documents from legacy products. But it does not require a reimplementations in the standard of all legacy formats. A good illustration how far removed EOOXML is from a real standard is given in the above mentioned How to hire Guillaume Portes by Rob Weir. A choice quote from Rob Weir, after reproducing the requirements for Word 95's spacing compatibility "between full-width East Asian characters in a document's content": What should we make of that? Not only must an interoperable OOXML application support Word 12's style of spacing, but it must also support a different way of doing it in Word 95. And by the way, Microsoft is not going to tell you how it was done in Word 95, even though they are the only ones in a position to do so. This aspect of EOOXML is consistent with the fact that MS EOOXML seems to be a memory dump of Office internal data structures. It can be imagined that MS Office stores its own formatting information in internal data structures, but uses hooks into legacy code, bugs included, to generate older formats. Legacy formats Microsoft might not know how to recreate themselves anymore. So when dumping its internal data to file, it inserts these hooks into the XML to refer to

these legacy code fragments. How anyone without these legacy code fragments could re-implement their behavior is beyond my comprehension. Maybe someone can enlighten me about this. In his blog, Brian Jones answers some of the points of Rob Weir and accuses ODF from having unspecified elements too. But read the comments on his blog about what questions Brian does not answer (and never answers, see this GL post). Brian Jones seem to confuse unspecified formatting elements in EOOXML that affect the layout of the document with unspecified application internal settings, eg, menu bar placement, in ODF. It is clear that the latter are not intended to be portable. Moreover, Brian Jones seems to confuse OpenOffice.org with the ODF standard. For instance, when he complains that OpenOffice.org has a config setting indicating legacy line-spacing. But this config setting is definitely not part of the ODF standard. Rob Weir discusses the lack of distance between OOXML and MS Office 2007 in Essential and Accidental in Standards where he concludes: It seems to me is that OOXML in fact does have application-dependent behaviors, but only for Microsoft Office, and that Microsoft has hard-coded these application-dependent behaviors into the XML schema, without tolerance or allowance for any other implementations settings. Something does not cease to be application-dependent just because you write it down. It ceases to be application-dependent only when you generalize it and accommodate the needs of more than one application. The inclusion of application config settings into the document standard on an equal footing strengthens the picture that projects EOOXML as a semi-automatic dump of the internal data structures of MS Office 2007. (on a personal note, it find it revealing that a very experienced MS developer like Brian Jones confuses a standard with the config options of an application) In short, EOOXML contains a lot of distinct legacy formats. This point is made very clearly in another of Rob Weir's blog posts Calling Captain Kirk: The OOXML specification, at 6,000+ pages has now just sucked in the complexity of one or more versions of HTML, MHTML, RTF and WordProcessingML. It requires that a conformant application understand these formats, but forbids a conformant application from producing them. This is another example of how you never know what you're getting when you get an OOXML file. To support OOXML is not to support a single format, or even a single family of formats. To fully support OOXML requires that you support OOXML plus a motley hodgepodge of various other formats, deprecated, abandoned and proprietary. The cost of compatibility with billions of legacy Microsoft documents is that you must support their legacy of years of false starts and restarts in the file format arena. Also Andy Updegrave's blog post The Contradictory State of OOXML refers to these proprietary legacy components in

EOOXML: Other parts of OOXML refer to OLE, macros/scripts, encryption and DRM \u2013 none of which are fully described. Nor has Microsoft stated whether necessary information will be supplied on a non-discriminatory basis to all (or at all). Stephane Rodriguess explains in a comment to Open Malaysia how the OLE in MS EOOXML is platform bound There is a reason why Microsoft does not document this stuff. They would have to give the documentation of OLE, which in turn would show clearly as in water that this stuff is platform-dependent : Windows. At some point, MS started to drum up "Representation" as the basic value of MS EOOXML, see Rob Weir's No representation without specification. This representation thing can be summarized as EOOXML is like a street directory without a map. It represents each address, but won't help you to find it. At this point, I am starting to seriously doubt whether even Microsoft could reimplement EOOXML from scratch."

Added:

<http://www.groklaw.net/article.php?story=20070720073215943>

We want control of Documents - and not to be controlled by Microsoft. Sovereign status of a state or commonwealth must be a priority...! Read below and understand how this affects MA and individuals.

"Finally, I want to control my own documents. I wrote them, and I wish to control them. This is the part I hope Massachusetts thinks about carefully. An important goal of government is to preserve documents so they don't become inaccessible to the public. Proprietary extensions by definition slam that door in your face, because you then lose control over your own documents. You can never have access now except through Microsoft, and if you think that company is going to be around in fifty or 100 years, you need to ask: are you positive? Can you guarantee it? And even if they are, whose documents are they now? Yours? Or Microsoft's? Who controls access?

If your goal is to avoid lock-in to a single vendor, then proprietary extensions should scare you silly. It doesn't matter then how many companies use the format or how many business partners want it or even if it is a de facto standard -- you are now dependent on one single vendor. That unhappy fate is precisely what ODF, and only ODF, can prevent.

So, why not just bite the bullet, merge ODF with Ecma-376, and make it possible for everyone to interoperate freely as we already can in email? I can send an email to my friends from my Linux computer or my Mac and they can still read it just fine, even if they do use Windows and love HTML email. I remember [Eric Kriss](#)

[told ComputerWorld](#) why not:

He said technical people at Microsoft told him it would be “trivial” to add support for ODF to the new Office 2007. The resistance to doing so came from the vendor’s business side, according to Kriss...."

So - Microsoft thinks that ODF and "Open Standards" are NOT agreeable to their business plan.

If you notice the dance that Microsoft is doing all over the world... it is to exclude and destroy any open standard that everyone can use (as it not in the best interest of Microsoft's balance sheet to have an open solution)!

See the following articles and the comments that follow as well:

- [Proprietizing Standards](#), 10:25 AM <http://www.groklaw.net/article.php?story=20070720073215943>
- [Notes from Portugal on the July 16th Meeting on Ecma-376](#), Wednesday 05:18 PM <http://www.groklaw.net/article.php?story=2007071812280798>

Thank-you!

Ready for the edge of your seat? [Check out tonight's top picks](#) on Yahoo! TV.

From: [GrokLaw OnceOnly](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Amended: Enterprise Technical Reference Model v. 4.0 Public Review Draft (added Groklaw 07-20-2007 info at end)
Date: Friday, July 20, 2007 5:10:44 PM
Attachments:

See:

"Questions for Microsoft on open formats " at
<http://news.bbc.co.uk/1/hi/technology/6291124.stm>

and please... do not include the Microsoft "not-open" OOXML format in the Enterprise Technical Reference Model v. 4.0 -

Microsoft's use of the word "open" is a sham and one has to question if it is or is not an outright lie in order to twist the weak minds of some into thinking that Microsoft's formats are open.

Read Microsoft's dirty tricks url below to see how Microsoft acts with others and standards. You can not change those Microsoft Monoploy based formats in to spots of a different color (the MS formats are not OPEN at all). Support -only the ISO Open Document Format (ODF) as this is the only truely open format... that has been developed by a group of individuals, education folks, business folks for it to be a usable format for the next 200 plus years. Reject - the Microsoft OOXML fomate one is a marketing play on words that is solely owned and developed by only Microsoft! The Microsoft business strategy is to NOT have a long lasting standard format, instead Microsoft's formats are now and have been designed as only a Microsoft ONLY usable format (the is a format that you know they must change to make the commonweath upgrade it's software to a newer format in the future). If you didn't have to change formats you would not have to upgrade. So, over the next 200 years will ISO ODF be a lower cost solution - Of course it will be - because it is also a "free to use" format that is designed to last a user 200 years and longer. Microsoft does not want the commonwealth not to pay them money to upgrade... they want the money paid every 3-4 years for the next new format they will invent for one reason (only to make money for Microsoft). How

many times do we need to buy another word processor... with ODF it will be never as software like OpenOffice.org is free to use... just ask the country of FRANCE as their tax department is using OpenOffice.org and ODF on about 80,000 computer (works on Windows, Linux, and Apple computers freely). If you would like information on how Microsoft plays (or does not play fairly)...

See:

http://www.grokdoc.net/index.php/Microsoft%27s_Standards_History
and

http://www.grokdoc.net/index.php/Dirty_Tricks_history

in this section you can read all about: " MS OfficeOpenXML MS' answer to ISO Open Document Format. OfficeOpenXML is an ECMA standard, Ecma-376, that implements MS Office 2007 (note, MS Office does not follow or implement the standard, it is the other way round). MS has played as dirty as they could to fight ODF. Just browse Consortium Info, Walt Hucks' blog, or Groklaw's ODF/XML page and follow the links for the story of ODF in Massachusetts and EOOXML in general. A quote from James Love on participants of the "Internet Governance Forum" on open standards: Many people are nervous about these issues, because Microsoft is investing millions to defeat them, and to attack personally government officials who Microsoft sees as too friendly to open standards, and to reward politicians and government officials who back Microsoft. This is no empty threat. Look at the story of Peter Quin, a government official who dared to back ODF. It is rather common to encounter cynicism with respect to Microsofts' intentions with the standardization efforts around EOOXML. EOOXML needs ISO approval to be eligible for governments bids because "Governments worldwide mandate that only internationally agreed open standards are acceptable when creating documents". A good example of the common feeling is found in Six thousand pages, one month, no chance...: Its preferred answer is to create its own open document format - OOXML - which can then be recognised as such by the international standards bodies. However, it does not want this to be something that its competitors can adopt freely. The answer is to game the system. As part of this, the company has created (by itself, unlike Open Doc) a proposal for OOXML that is six thousand pages long, and then put it into the fast-track approval system with very minimal time for discussion and objection. GrokDoc has a page to file EOOXML objections to the ISO fast track procedure and two Groklaw articles explaining it, Searching for Openness in Microsoft's OOXML and Finding Contradictions and Deadline Looms to Express Concerns about ECMA 376 Office Open XML, with the usual plethora of insightful comments. For a quick

comparison of ODF and EOOXML, see Rob Weir's OpenOffice.org Conference 2006 presentation. This also goes into performance questions. A more extensive comparison is given by The Open Document Fellowship, both in general terms and in more technical terms. Sam hiser has written an excellent summary of the differences is "usability" of the standards Achieving Openness: a closer look at ODF & OOXML, a must read for the arguments. The ODF standard was designed with (legacy versions of) MS Office documents in mind. In contrast, EOOXML was not developed as a standard, but as a description of MS Office 2007, without regard to anyone else (see this historical comment on the mindset of MS developers). Therefore, EOOXML implements mostly a subset of what is possible under ODF. This history is explained in a Groklaw comment by Garry Edwards. In short, MS claims EOOXML is needed because ODF cannot represent all legacy MS Office formats and is inefficient. The ODF "camp" has created the Da Vinci converter plugin and claims 100% round-trip fidelity between ODF and the last MS Office binary formats. Furthermore, this plugin also proves the efficiency of the ODF format. Note that the final release of MS Office2007 mysteriously broke the plug-ins as discussed by Dana Blankenhorn in Microsoft playing three card monte with XML conversion. We learn the real reason MS couldn't standardize on ODF from Bill Hilf of MS himself, as recorded by Dinesh Nair in the Open Malaysia blog: What got really interesting was when Yusseri raised the issue of OOXML and why didn't Microsoft just work on ODF in collaboration instead of creating a new, bloated standard. Bill's answer was quite surprising, as he clarified that the file format (OOXML) was a part of the software and that OOXML and the software (MS Office) are quite inseparable. Ergo, OOXML is an integral and inseparable part of MS Office. That's why they could not adopt ODF as the file format for subsequent versions of MS Office. So all the rumours that OOXML is nothing but a dump of Office2007 and not an international, free and open standard are now confirmed by a MS spokesman. In the run-up of the decision whether or not EOOXML should take the ISO fast track, MS tried to convince the National Bodies that they are not allowed to vote against EOOXML because EOOXML could physically exist next to ODF (succeeding with the US NB), see Rick Jelliffe's and Brian Jones' blogs. This campaign tried to confuse the technical bodies with an unreasonable strict technical definition of a contradiction, ignoring the fact that this phase is intended to identify obstacles to trade (monopolies) and violations of international trade rules as is explained by Marbux. The campaign even became comical, see Open Malaysia:Microsoft's Definition of Contradictions and The Art of Rewriting History. It didn't work that well, given that many countries filed objections, see Andy Updegrove's blog post and his

comments on the actual responses. In the end, MS seem to just buy their way to an ISO standard by swamping the voting members with their employees. So MS will have a majority by making sure that most voting individuals are on their payroll. (On a personal, opinionated note: What is the worth of a voting system where the majority of the voters get sacked if they vote against a single entity) [edit]

Licensing MS EOOXML is advertised as an "Open" standard by Microsoft. So it is expected that the license for it's use will at least match the openness of ODF and PDF. Two questions will be asked by any prospective user: 1. Can someone stop me if I write and distribute an application that uses this standard? 2. Under what conditions can I use this standard? For ODF and PDF the answers are, respectively, Noone (1) and some conditions on the use of the name PDF (2). How is this for EOOXML? Microsoft has written the standard and currently has the only working implementation of EOOXML. Therefore, MS are the only ones who know what copyrights and patents must be licensed from MS and third parties to implement EOOXML. But as of January 2007, Microsoft have consistently refused to identify the copyrights and patents that must be licensed to implement EOOXML. The language used by MS in the EOOXML licenses and "covenants not to sue" is so intricate (and peculiar), that many people still doubt whether it really allows anyone but Microsoft to implement EOOXML. Microsoft has changed the licenses for EOOXML during the years. The initial offer for licensing was seriously flawed as of March 2005. In December 2005, there were still major worries about the pledges not to sue by Microsoft and the ECMA terms of reference. But as late as the start of 2007 there were still doubts whether it would be legal to implement the standard in a meaningful way. To quote the conclusion of Analyzing the Microsoft Office Open XML License: In this way, the License is stated and is to be perceived as a threat rather than a promise. In effect it says 'Stay away! Microsoft is the only entity which may implement the Microsoft Office Open XML formats!' This is a fundamental contradiction of the purpose of an open standard. In the comments section of this blog, Marbux remarks that the peculiar language chosen for the EOOXML license makes him conclude that But as a legal foundation for building apps that can take thousands of person-hours, this covenant not to sue is legal quicksand of unknown depth. Or, as Andy Updegrove puts it: And taking that concern a step further, consider the fact that OOXML also apparently violates section 2.14 of the ISO/IEC Directives, Part 1, in that not all of what it takes to implement OOXML appears to be covered by Microsoft's patent pledge, in two respects. First, the pledge does not explicitly cover material that is referenced, but not included in the specification, and second, the Microsoft patent commitment does not cover optional features. Sections of

OOXML that are not fully described include those that require compliant implementations to mimic the behavior of Microsoft products, such as those products and capabilities referred to above (OLE, etc.) Microsoft will need to clarify whether its patent commitment will in fact extend to these requirements. Potentially, these concerns would involve large portions of OOXML, in contradiction of the ISO/IEC requirement that more than a bare-bones implementation must be permitted without fear of infringement. Most of this is also discussed in Searching for Openness in Microsoft's OOXML and Finding Contradictions and the GL EOOXML objections project page. There is also a Microsoft commissioned evaluation of the license by Baker and Mackenzie from 2006. See, eg, these discussions on GL and the Grokdoc Talk:Objections page. Basically, the Baker and Mackenzie does not address any of the criticisms leveled against the two licenses: Covenant Not to Sue (CNS) and the Open Standards Patent (OSP) license. The report has some careful choice of words, but nowhere does it state that a blanket patent license is given for implementing the EOOXML specifications in full. This all can lead to rather comical dialogs with MS legal representatives as was exemplified in this OpenMalaysia blog Billions of Documents. At a SIRIM TC4 meeting on ECMA 376, Microsoft was represented by Stephen Mutkoski (a lawyer). A member of the technical committee asks a simple question: They sent a lawyer to a Technical Committee briefing. Okay, perhaps we could get more legal information then. ... So if Macros are not included in Ecma 376, will developers who develop it independently get sued?" "I will have to get back to you ...” To summarize the licensing problems, the answers to the above questions for your future EOOXML compliant software can be provisionally given as: 1. Microsoft can stop any attempt to distribute your application 2. You need permission from Microsoft for every application of EOOXML on a computer [edit] (In-)Compatibility with other standards MS wants its own XML format to be an ISO standard. However, MS' format does not conform to many other ISO or W3C standards. You might even think MS doesn't like the W3C ;-): See eg, Wikipedia, OpenDocument Fellowship, Open Malaysia: MSOOXML's disregard for existing standards and, of course, Bob Sutor's blog. See also this GL discussion: Again from the newspick: a description of why ODF and OOXML don't interoperate. Office Open XML unquestionably duplicates or at least significantly overlaps with the ODF specification; moreover, unlike Office Open XML, OpenDocument incorporates still other standards such as XPath, XLinks, SVG, XForms, and MathML. Office Open XML reinvents the wheel at every turn rather than relying on existing open standards. The failure to implement XPath in Office Open XML is particularly problematic; it makes full fidelity in

automated XSL transformations to and from other XML formats next to impossible. That problem creates a contradiction in the ISO sense; full interoperability between ODF and EOOXML applications is infeasible. According to the Wikipedia XPath is the following: XPath (XML Path Language) is an expression language for addressing portions of an XML document, or for computing values (strings, numbers, or boolean values) based on the content of an XML document. The XPath language is based on a tree representation of the XML document, and provides the ability to navigate around the tree, selecting nodes by a variety of criteria. In popular use (though not in the official specification), an XPath expression is often referred to simply as an XPath. Originally motivated by a desire to provide a common syntax and behavior model between XPointer and XSLT, XPath has rapidly been adopted by developers as a small query language. I gather that if OOXML do not implement XPath, then documents in this format cannot be queried using normal XML tools. For example Wikipedia says the following on XSLT. XSLT is a specific kind of template processor primarily designed to "transform" XML documents into other XML documents. The original document is not changed; rather, a new document is created based on the content of an existing one.[3] The new document may be serialized (output) by the processor in standard XML syntax or in another format, such as HTML or plain text.[4] XSLT is most often used to convert data between different XML schemas or to convert XML data into HTML or XHTML documents for web pages, or into an intermediate XML format that can be converted to PDF document [snip] XSLT relies upon the W3C's XPath language for identifying subsets of the source document tree, as well as for performing calculations. XPath also provides a range of functions, which XSLT itself further augments. This reliance upon XPath adds a great deal of power and flexibility to XSLT. What strikes me of such tactics is they are borderline on misrepresentation. When a supplier says he is using XML, most IT managers will understand a reasonably complete suite of XML related standards will be used to generate the full benefits of XML. By silently picking and choosing which standards in the XML suite they implement, Microsoft breaks this assumption without informing its customers. Open Malaysia has a very nice writeup on the VML (non-)deprecation in MS EOOXML Is VML in or out now, or was that a typo?. So: * 1. VML is included for backwards compatibility reasons only. * 2. DrawingML is newer and richer and designed to replace VML. * 3. VML is deprecated and only included for legacy reasons * 4. New applications are strongly encouraged to use DrawingML instead This simply begs these questions: * 1. Why then is Section 2.3.1 explicitly using VML? * 2. Where are the instructions for using DrawingML instead? * 3. If DrawingML is richer and

designed to replace VML, why have VML in the first place? * 4. I would take it that Office 2007 is a "new application" and should use DrawingML instead of VML. Does it? What is extra interesting is the long first comment from Stephane Rodriguez who explains that VML was implemented to lock the internet, IE, to MS Office. So the Office team at Microsoft could not manage to get rid of VML. It is possible, unless they intentionally use it as a lock-in tool, that next version of Office, codenamed Office 14, will be the first one to have an Office-wide DrawingML implementation. Until then, Office 2007 is at odds with the specs that Microsoft is pushing and as a result, it is not a reference implementation of the specs! In other words, since there cannot be a non-Microsoft implementation of the specs (it will take at least ten years for a company starting now, and it will never achieve 100% fidelity since many things are missing in the specs), it follows that there is simply NO reference implementation out there! Quite amazing... Standards flouted in MS EOOXML (see also Rob Weir's ooocon2006 presentation and Andy Updegrave's The Contradictory State of OOOXML): * Codes for the Representation of Names and Languages ISO 639 * Computer Graphics Metafile ISO/IEC 8632 * XLink W3C * XForms W3C * XPath W3C * SVG W3C * MathML W3C * SMIL W3C * Gregorian Calendar ISO 8601 (EOOXML redefines leap years and uses two start dates for counting, 1900 and 1904, see also Brian Jones' apology blaming the bug on a programming shortcut in Lotus 1-2-3.) The 1900 leap year bug is an excellent illustration of how Microsoft treats standards as documentation of their code binaries, including all legacy bugs. Other links * The Future of Lock-in * Game Time for OpenDocument * Searching for Openness in Microsoft's OOOXML and Finding Contradictions * Deadline Looms to Express Concerns about ECMA 376 Office Open XML * Standardizing away the world's languages * Cum mortuis in lingua mortua (SVG/VML) * OOOXML has poor XML Element names [edit] Office2007 implementation At the start of 2007, only Office 2007 implements EOOXML. However, it is reported that Office2007 does prefer a binary format after all. Allegedly, for performance reasons. This GL comment says it all (see also this continuation) Checking the Rob Weir blog I notice that MS Office 2007 is not using OOOXML after all. There is yet another binary format that is silently introduced and touted as the preferred option. Rob Weir says: It is also interesting that Microsoft is positioning this format as the preferred one for performance and interoperability. The online help for Excel 2007 says: In addition to the new XML-based file formats, Office Excel 2007 also introduces a binary version of the segmented compressed file format for large or complex workbooks. This file format, the Office Excel 2007 Binary (or BIFF12) file format (.xls), can be used for optimal performance and backward

compatibility. The Gary Edwards blog (from the newspick) posted another finding of Rob Weir that I wasn't able to locate on his blog. Another interesting point, courtesy of the inexhaustible Rob Weir, is that MSOffice 2007 has the unique ability to produce two kinds of EooXML. I've never seen an application do this before, and one has to wonder why? What Rob discovered is that if you import a legacy BoB into MSOffice 2007, the application will convert it to EooXML fully preserving the originating application binary encodings \u2013 even doing so within laughably and descriptively colorful named XML tags. Fine. We can easily do that with ODF using the infamous tag model. No inadequacy to be found here. (Damn, if only we had patented that technique. Phil Boutros must be lapping this up :) One of the examples Rob pointed out is the use of the long since deprecated VRM encoding. Good work MSOffice 2007! Next Rob re created that same legacy document \u201cnatively\u201d in MSOffice 2007. Exactly the same! Saved it as EooXML. Then examined the XML, comparing the two EooXML files. Well well well. They are substantially different! Same application. Same file format. Same document content and presentation. Different EooXML! Interestingly, for one thing there is no VRM encoding. It's been replaced by the proprietary application/platform dependent but forward Vista ready DrawingML. Some will argue that this is the only way to preserve backward compatibility. I would argue that this will result in an information nightmare. Only one of the EooXML files is backwards compatible. The other is ready for the Vista bound information processing chain centered on the Exchange/SharePoint Hub. How are organizations going to keep things straight? How can someone interoperate with Office 2007? People will have to sort out which of the ever changing file format is being produced. ISO standardisation looks pretty much like a decoy. It can be used (if at all) to send information in the MS Office suite but it will never get out. Governments that want standards for sovereignty purposes will get a "standard" but not the sovereignty. Here is Bob Sutor's opinion from We have proprietary extensions to Microsoft Office Open XML already. Here\u2019s an idea of how things are already reverting to the same old behavior, right when Microsoft is trying to convince the ISO how wonderful for interoperability their spec is supposed to be. One point being made in several places, eg, in MS Office 2007 is not using OOXML, is that Visual Basic macros in Excel (VBA) are stored in a binary (unreadable) form in EOOXML (they are not described in the standard). That is, the ASCII VB macros cannot be exported to another application using EOOXML. An anonymous comment in this blog claims that VBA macros are Excel internal and have no use outside. But other applications are implementing VB too, so that argument is incorrect. To summarize, MS warn users to not use

OOXML to store a large spreadsheet because of bad performance and that EOOXML cannot represent all information in Excel2007. These posts also suggest that a lot of the attacks on ODF, eg, bad performance on large spreadsheets (and here) and inability to represent all of MS Office features, were pre-emptive strikes to divert from the shortcomings of EOOXML itself. (and some find OO.o is faster than MS Office) [edit] Alternative Implementations As far as I know, this might be the first ISO standard that fully implements just a single product of such horrible complexity (running over 6000 pages). It costs MS themselves an estimated 150 work years to implement their own standard. However, this was later qualified by Andrew Shebanow after a response from Rick Schaut with a different set of statistics. But even after all numbers juggling, it is still not clear whether other groups can implement the exact same product, and if they can, how much time this will take. According to How to hire Guillaume Portes by Rob Weir, it is clear that Microsoft withholds essential information to fully implement EOOXML. For a more comprehensive comparison between EOOXML and ODF, see ODF/OOXML technical white paper. 'Rumours' have it that MS EOOXML is just a serialized, packaged memory dump of the internal Office data structures. As Rob Weir puts it: The astute reader will notice that this is pretty much a bit-for-bit dump of the Windows SDK memory structure. In this case the file format specification provides no abstraction or generalization. It merely is a memory dump of a Windows data structure. Bill Hilf has meanwhile confirmed these rumours as reported by the Open Malaysia blog. A good standard does contain features that help converting documents from legacy products. But it does not require a reimplementations in the standard of all legacy formats. A good illustration how far removed EOOXML is from a real standard is given in the above mentioned How to hire Guillaume Portes by Rob Weir. A choice quote from Rob Weir, after reproducing the requirements for Word 95's spacing compatibility "between full-width East Asian characters in a document's content": What should we make of that? Not only must an interoperable OOXML application support Word 12's style of spacing, but it must also support a different way of doing it in Word 95. And by the way, Microsoft is not going to tell you how it was done in Word 95, even though they are the only ones in a position to do so. This aspect of EOOXML is consistent with the fact that MS EOOXML seems to be a memory dump of Office internal data structures. It can be imagined that MS Office stores its own formatting information in internal data structures, but uses hooks into legacy code, bugs included, to generate older formats. Legacy formats Microsoft might not know how to recreate themselves anymore. So when dumping its internal data to file, it inserts these hooks into the XML to refer to

these legacy code fragments. How anyone without these legacy code fragments could re-implement their behavior is beyond my comprehension. Maybe someone can enlighten me about this. In his blog, Brian Jones answers some of the points of Rob Weir and accuses ODF from having unspecified elements too. But read the comments on his blog about what questions Brian does not answer (and never answers, see this GL post). Brian Jones seem to confuse unspecified formatting elements in EOOXML that affect the layout of the document with unspecified application internal settings, eg, menu bar placement, in ODF. It is clear that the latter are not intended to be portable. Moreover, Brian Jones seems to confuse OpenOffice.org with the ODF standard. For instance, when he complains that OpenOffice.org has a config setting indicating legacy line-spacing. But this config setting is definitely not part of the ODF standard. Rob Weir discusses the lack of distance between OOXML and MS Office 2007 in Essential and Accidental in Standards where he concludes: It seems to me is that OOXML in fact does have application-dependent behaviors, but only for Microsoft Office, and that Microsoft has hard-coded these application-dependent behaviors into the XML schema, without tolerance or allowance for any other implementations settings. Something does not cease to be application-dependent just because you write it down. It ceases to be application-dependent only when you generalize it and accommodate the needs of more than one application. The inclusion of application config settings into the document standard on an equal footing strengthens the picture that projects EOOXML as a semi-automatic dump of the internal data structures of MS Office 2007. (on a personal note, it find it revealing that a very experienced MS developer like Brian Jones confuses a standard with the config options of an application) In short, EOOXML contains a lot of distinct legacy formats. This point is made very clearly in another of Rob Weir's blog posts Calling Captain Kirk: The OOXML specification, at 6,000+ pages has now just sucked in the complexity of one or more versions of HTML, MHTML, RTF and WordProcessingML. It requires that a conformant application understand these formats, but forbids a conformant application from producing them. This is another example of how you never know what you're getting when you get an OOXML file. To support OOXML is not to support a single format, or even a single family of formats. To fully support OOXML requires that you support OOXML plus a motley hodgepodge of various other formats, deprecated, abandoned and proprietary. The cost of compatibility with billions of legacy Microsoft documents is that you must support their legacy of years of false starts and restarts in the file format arena. Also Andy Updegrave's blog post The Contradictory State of OOXML refers to these proprietary legacy components in

EOOXML: Other parts of OOXML refer to OLE, macros/scripts, encryption and DRM \u2013 none of which are fully described. Nor has Microsoft stated whether necessary information will be supplied on a non-discriminatory basis to all (or at all). Stephane Rodriguess explains in a comment to Open Malaysia how the OLE in MS EOOXML is platform bound There is a reason why Microsoft does not document this stuff. They would have to give the documentation of OLE, which in turn would show clearly as in water that this stuff is platform-dependent : Windows. At some point, MS started to drum up "Representation" as the basic value of MS EOOXML, see Rob Weir's No representation without specification. This representation thing can be summarized as EOOXML is like a street directory without a map. It represents each address, but won't help you to find it. At this point, I am starting to seriously doubt whether even Microsoft could reimplement EOOXML from scratch."

Added:

<http://www.groklaw.net/article.php?story=20070720073215943>

We want control of Documents - and not to be controlled by Microsoft. Sovereign status of a state or commonwealth must be a priority...! Read below and understand how this affects MA and individuals.

"Finally, I want to control my own documents. I wrote them, and I wish to control them. This is the part I hope Massachusetts thinks about carefully. An important goal of government is to preserve documents so they don't become inaccessible to the public. Proprietary extensions by definition slam that door in your face, because you then lose control over your own documents. You can never have access now except through Microsoft, and if you think that company is going to be around in fifty or 100 years, you need to ask: are you positive? Can you guarantee it? And even if they are, whose documents are they now? Yours? Or Microsoft's? Who controls access?

If your goal is to avoid lock-in to a single vendor, then proprietary extensions should scare you silly. It doesn't matter then how many companies use the format or how many business partners want it or even if it is a de facto standard -- you are now dependent on one single vendor. That unhappy fate is precisely what ODF, and only ODF, can prevent.

So, why not just bite the bullet, merge ODF with Ecma-376, and make it possible for everyone to interoperate freely as we already can in email? I can send an email to my friends from my Linux computer or my Mac and they can still read it just fine, even if they do use Windows and love HTML email. I remember [Eric Kriss](#)

[told ComputerWorld](#) why not:

He said technical people at Microsoft told him it would be “trivial” to add support for ODF to the new Office 2007. The resistance to doing so came from the vendor’s business side, according to Kriss...."

So - Microsoft thinks that ODF and "Open Standards" are NOT agreeable to their business plan.

If you notice the dance that Microsoft is doing all over the world... it is to exclude and destroy any open standard that everyone can use (as it not in the best interest of Microsoft's balance sheet to have an open solution)!

See the following articles and the comments that follow as well:

- [Proprietizing Standards](#), 10:25 AM <http://www.groklaw.net/article.php?story=20070720073215943>
- [Notes from Portugal on the July 16th Meeting on Ecma-376](#), Wednesday 05:18 PM <http://www.groklaw.net/article.php?story=2007071812280798>

Thank-you!

Be a better Heartthrob. [Get better relationship answers](#) from someone who knows. Yahoo! Answers - Check it out.

From: [Jason Jackson](#)
To: [Standards \(ITD\)](#);
CC:
Subject: regarding Ecma-376 as an open standard for use with government documents
Date: Friday, July 20, 2007 4:58:54 PM
Attachments:

The point of an open standard is that everyone can use it, and twenty years from now we will still be able to read historically important records. Microsoft refuses to participate in a truly open standard (ODF) and they have yet to actually explain this refusal. They could implement ODF easily and still offer backwards computability with legacy file formats, since those file formats belong to Microsoft.

I have three questions:

Why do they refuse to support an international standard when it would clearly be easy for them to do so?

If the reason they won't support ODF is because it is open enough to allow competitors a chance to take away Microsoft's monopoly than why should we believe that OOXML is going to be open enough to achieve the goals stated in the first part of this email, since this would also be open enough to allow competitors a chance?

Why does Microsoft keep claiming that when Massachusetts decided on ODF they were excluding Microsoft from future purchases, when this is clearly not true? Microsoft could have added ODF support to existing Office products with no more than a patch or a translator, both easily made. Microsoft consistently claimed that they were being excluded from government contracts even though their own programmers had to know that this was completely untrue. ODF is an open standard and Microsoft is as free as anyone else to implement it and use it in their programs.

I would hope that Massachusetts would return to using only ODF as their file format, if they do so Microsoft will eventually support it just to keep the

Massachusetts government business that they already have. The original decision to use ODF was entirely logical and correct, changing it under pressure from Microsoft was a mistake, and should be corrected.

Jason Jackson
-Software Developer

From: [Douglas Johnson](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ETRM v 4.0 Comment
Date: Friday, July 20, 2007 4:57:18 PM
Attachments: [Sun V1 position.pdf](#)

Bethann Pepoli, Acting CIO
Information Technology Division
Commonwealth of Massachusetts
One Ashburton Place, Room 801
Boston, MA

Re: Comment on ETRM Draft 4.0

Dear Ms. Pepoli:

The Massachusetts Information Technology Division is proposing to include MS Office Open XML, ECMA 376 (OOXML) in the Enterprise Technical Reference Manual v. 4.0, in addition to the OpenDocument Format (ODF), ISO 29400, which was included as of ETRM v. 3.5.

We believe the inclusion of a second document format standard, with known interoperability issues with your existing standard is premature. ECMA 376 is only now undergoing an objective assessment of its ability to meet its stated goals of interoperability and enabling competitive implementations. Attached is a summary of Sun's position, developed over the last few months as a participant in the US National Body advisory committee, V1. In light of these findings, we voted against approval of the specification in its current form. This reflects our belief that these very significant shortcomings must be addressed prior to acceptance of ECMA 376 as an ISO standard.

Just as we believe that ECMA 376 has technical issues that should be explored more fully and addressed prior to becoming an ISO standard, we also believe that the impact of a policy including both standards should be far better understood than at present.

For example, in the case of ODF, the Commonwealth has carefully

considered and ultimately adopted Sun's plug-in for ODF support in Microsoft Office applications to minimize application and desktop impacts. We would suggest further detailed study of the availability and operation of the various OOXML converters available to ensure that they meet the Commonwealth's needs, both in fidelity and impact on workflows and business processes.

We are also concerned that the high water mark on accessibility features set with ODF 1.1 may not be met with OOXML. ETRM v. 4.0 should not recede from this mark. Indeed, the Commonwealth insisted on ODF v1.1 because it addressed issues discovered by a peer review body of all y experts and PWDs; such a body doesn't seem to exist for OOXML. Furthermore, ODF v. 1.1, via OpenOffice.org & UNIX, provides very affordable accessibility solutions, addressing a critical need for low or no cost options for the PWD community. Any considerations for additional document formats should be held to similarly high technical standards and cost-effectiveness.

ITD has demonstrated great vision by endorsing an open standards IT policy specifically designed to take advantage of the many benefits of open standards. These benefits include competition in implementation (leading to choice and price competition), technologies free from individual vendor actions, and innovation on top of the standard.

Additional advantages of true open standards (those created, implemented, and supported by multiple vendors, as well as other interested communities) may not be obvious in the present, but become much clearer over the long run. For example, the nearly four decade evolution of the Internet as a collection of open standard networking protocols resulted in an infrastructure that provided the ecosystem in which World Wide Web protocols (again a set of open standards) could be created. Once the issue of non-interoperable competing networking protocols was resolved (collapsing to TCP-IP everywhere in the mid 90s) the Web quickly transformed computing experience to provide the network richness we see today.

That success was due to the participation and contributions of many participants, each seeking to build on the rich, extensible, and open specifications of the Internet.

The Commonwealth evaluated many technologies for potential inclusion in the ETRM in 2005, including document formats. Recognizing the value and

promise of open standards, ITD chose ODF in order to regain competition and choice in an area long devoid of such options. It would be a disappointment to see the Commonwealth leave that path without a full analysis of the costs, issues and impacts of doing so.

Sincerely,

--

Carl Cargill
Director, Corporate Standards
Sun Microsystems, Inc.

From: [Jeanne Rasata](#)
To: [Standards \(ITD\);](#)
CC:
Subject: I support OpenDocument
Date: Friday, July 20, 2007 4:55:59 PM
Attachments:

To whom it may concern,
I think the government needs to use a document format that is independent of proprietary vendors and that can be implemented in free software.
Thank you for taking this into account when making you decision.
Sincerely,
Jeanne Rasata

From: [Rick Edwards](#)
To: [Standards \(ITD\)](#);
CC:
Subject: OpenXML vs ODF
Date: Friday, July 20, 2007 4:50:47 PM
Attachments:

To whom it may concern,

I strongly support the use of ODF as the official electronic document format for the Commonwealth. Unlike Microsoft's OpenXML it actually is an open and standard. The real value of government documents should be their contents, not the minutia of formatting. Using a standard like ODF means that the documents will always be readable even if the software that created them is no longer available. Microsoft's format doesn't provide that guarantee and furthermore locks the Commonwealth into an endless upgrade cycle. Using ODF ensures the availability of information that belongs to the people of Massachusetts.

Sincerely,
Rick Edwards
161 Waverley St.
Belmont, MA 02378

From: [Beveridge, John W.](#)
To: [Standards \(ITD\);](#)
CC: [Buchanan, Robert A.;](#)
Subject: Comments on ETRM 4.0
Date: Friday, July 20, 2007 4:40:44 PM
Attachments: [ETRM Exposure Comments 20jul07.doc](#)

Please find attached comments document.

John W. Beveridge
Office of the State Auditor
20jul07

<<ETRM Exposure Comments 20jul07.doc>>

From: [SRogers at mctf.state.ma.us](mailto:SRogers@mctf.state.ma.us)
To: [Standards \(ITD\);](#)
CC:
Subject: Open office
Date: Friday, July 20, 2007 4:38:16 PM
Attachments:

I would like to express my support for the Commonwealth to decline the Open Office formats. I hope that this will reduce the excessive costs associated with using Microsoft products and will improve access to technology,

respectfully,
Sarita Rogers

Sarita Rogers
Director of Home Visiting
MA Children's Trust Fund
55 Court St, 4th Floor
Boston, MA 02108
ph. 617.727.8957 toll-free 1.888.775.4KID
ph. 617.502.8731
fax 617.727.8997
www.mctf.org www.onetoughjob.org

CTF has moved!
Please note the new address

From: [Brotherred](#)
To: [Standards \(ITD\)](#);
CC:
Subject: OOXML and ODF
Date: Friday, July 20, 2007 4:30:40 PM
Attachments:

To whom it may concern,

I am not a resident of Massachusetts and for that reason have not thought that I should write to you. However it has never been said that the discussion is for your residents only. On the issue of word processing standards I find the very issue and confusion to be over complicated .

The fact is that Microsoft being a convicted monopolist has no reason to work with others so expecting that you will get open standards from them is crazy. That is if the definition of crazy is to do the same thing over and over again and expect different results.

ODF and OOXML are not compatible with one another sense there is a translator that is needed to get the two to work. The specifications of said translator are not open but are closed off and open to only those that sign nondisclosure agreements. This is not the definition of open standards. This does not meet the priorities that you have set out in the framing of this discussion.

Your purpose it seems for having these debates is so that you can find a file format that will always be readable. Also that it be readable regardless of the word processing program used. Do not expect this from Microsoft. I can not say it strongly enough as I have already shown.

I am in college and in class there are discussions about which Microsoft format should be used as some have MS Word and others still have MS Works. This does not happen in open standards. Because regardless of the preferred format for a given program in all of the three or four word processors I have used over the last couple of years there is one that will always be open to them.

I think that you should use ODF as you can clearly see. OOXML is the format that is going to be used by Microsoft and its partners. So by using ODF you will be able to access documents made by all non-Microsoft word processors. When and if translators are needed you can expect the open source community to write them. That is what Microsoft has done with the OOXML translator.

On the issue of the translator itself Microsoft did not build it and does take the credit for it. You only hear them say that such a translator exists you do not hear them say that they made it. Lastly such translators only work part way as not all the specifications are open even to those that sign NDA's

Sean M Campbell
Muskegon, MI

—
Matthew 10:16

I am sending you out like sheep among wolves. Therefore be as shrewd as snakes and as innocent as doves.

Matthew 10:16

~~~~~  
1. Those that do not know; pay for it. 2. You will never know what you refuse to understand.

**From:** [Robert Horn](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Comment on OOXML proposal  
**Date:** Friday, July 20, 2007 4:20:06 PM  
**Attachments:**

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I expect others will have many detailed comments on the suitability of OOXML as an acceptable format for MA state documents. I am opposed to accepting any new format that does not meet the openness and effectiveness definitions below:

#### OPENNESS

There should be no legal barrier to any person or organization making a complete implementation of the standard. This means that there should be no patent restrictions, licenses needed, etc. This should apply to designing, building, distributing, and selling such implementations. It should be reasonable for an eccentric individual to develop an OOXML implementation in their back room; and, it should be reasonable for a large company to develop an OOXML implementation without fear of financial or legal consequences.

At present, the statements from Microsoft regarding OOXML licenses and patents are unclear and open to change. There need to be statements as clear and unambiguous as those from Adobe for PDF.

#### EFFECTIVENESS

The true test of a standard is whether there exist at least two independent implementations that successfully interoperate. All of the procedural requirements and formalisms of the standardization process are attempts to ensure this by process. They do not ensure success. There are numerous unsuccessful standards. Massachusetts should wait until there are two independently developed implementations that successfully exchange files. I know that PDF has met this test. I think ODF passes this test. OOXML does not yet pass this test.

Massachusetts should postpone consideration of OOXML until both of these

are resolved. Microsoft can address the first issue. Only the decision of some second organization to independently implement OOXML can deal with the second. Massachusetts should also ensure that this second implementation is a genuinely independent implementation that does not depend in any way upon Microsoft components or other information that is not present in the OOXML standard.

Robert Horn

17 Concord St.  
Maynard, MA

**From:** [tom rabon](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ETRM V 4.0 Red Hat Submission  
**Date:** Friday, July 20, 2007 4:10:04 PM  
**Attachments:** [MassETRMv4CommentsRevised.odt](#)

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Please find comments offered on behalf of Red Hat, Inc. in the attached document which is saved in an ODT format. Thank you.

-

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Tom Rabon  
Executive Vice President Corporate Affairs  
Red Hat Inc  
919/ 754 -3700 x44141  
email: trabon at redhat.com

**From:** [Jeff Mazzella](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Public Comment on the Enterprise Technical Reference Model (ETRM) v. 4.0  
**Date:** Friday, July 20, 2007 4:01:42 PM  
**Attachments:** [CFIF Public Comment on ETRM v. 4.0.pdf](#)

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July 20, 2007

Information Technology Division  
Common Help Service Desk  
200 Arlington Street  
Chelsea, MA 02150

**Re: Center for Individual Freedom Response to Request for Public Comment on the Enterprise Technical Reference Model (ETRM) v. 4.0.**

To Whom It May Concern:

On behalf of the Center for Individual Freedom (CFIF), a national free market advocacy organization with more than 2,000 supporters and activists in Massachusetts, I submit this public comment to the state's Information Technology Division regarding the proposed update to its Enterprise Technical Reference Model (ETRM).

Specifically, as Massachusetts addresses the issue of open standards as part of its software procurement practices, CFIF is happy to see that the Division is considering the inclusion of Office Open XML as an acceptable file format. Indeed, we recommend that Office Open XML be permitted, which will be a good first step toward ensuring the Commonwealth is able to fully benefit from greater



competition and innovation.

CFIF commends the new Administration for its willingness to improve upon the current ETRM, which severely limits file choices. We believe that state agencies must have the ability to purchase or license software based on fair evaluations and assessments of the comparative merits of *all* competing products. In essence, the state should buy software that provides the greatest value at the lowest cost.

Unfortunately, Massachusetts already has severely limited its procurement choices by mandating the use of open source software. While CFIF believes it's in the state's and its taxpayers best interests to open its procurement choices to all available software options, it only makes sense, as long as that mandate remains, that Massachusetts encourages the use of as many open source formats as possible.

By expanding its software options, Massachusetts will be in a better position to integrate data from other systems, such as health care and financials records, and ensure it is providing solutions to meet those present and future needs. In addition, multiple file formats will encourage competition, which will lead to better products and efficiency for the state's taxpayers. That is why the Information Technology Division should cast a wide net and include software such as Office Open XML in its list of acceptable formats.

To limit choice by giving preference to one type of software over another is bad public policy that ignores the best interests of Massachusetts' taxpayers. The state should not hamper its ability to find the best solutions to future technological challenges, but rather encourage multiple choices in order to ensure the best possible outcomes.

Thank you for your time and consideration.

Sincerely,

/s/

Jeffrey Mazzella

President

Center for Individual Freedom

113 S. Columbus Street, Suite 310

Alexandria, VA 22314

703-535-5836

703-535-5838 (fax)

[www.cfif.org](http://www.cfif.org)

**From:** [Rob Weir](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Comments on ETRM 4.0 draft  
**Date:** Friday, July 20, 2007 4:00:03 PM  
**Attachments:**

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To whom it may concern:

I'd like to write to you as a long-time Massachusetts resident and taxpayer. My employer (IBM) will likely submit their own comments, but I'd like to offer you my own personal views on the ETRM 4.0 draft.

I am proud of the Commonwealth's tradition of openness in government, enshrined in our Public Records Law and Open Meeting Law. As James Madison wrote, "A popular government, without popular information, or the means of acquiring it, is but a prologue to a farce or a tragedy. A people who mean to be their own governors must arm themselves with the power which knowledge gives them." So access to government documents, now and for posterity, is critical for public oversight and participation in government, as well as for preserving our heritage. Now that we've moved into the digital age, access to government documents requires that these documents be made available in a format that all Commonwealth residents can read. So the move toward open documents formats, as called for in the ETRM, is laudable. A citizen must never be dependent on any single vendor for the software needed to read their government's documents.

However, I am concerned at the proposed addition of Ecma Office Open XML (OOXML) to the list of acceptable document formats. As you may have heard, OOXML is currently undergoing review by ISO/IEC JTC1 for possible approval as an ISO standard. As part of this review, technical committees in standards bodies around the world are reviewing OOXML and appraising its suitability as an International Standard. As a participant in the US committee reviewing OOXML, INCITS V1, I had the opportunity to review the text of the OOXML specification and to discuss it with others. I am sorry to report that I found the OOXML specification to be full of errors and omissions. Of course, no technical document is perfect. But this one, in particular, is of far greater length (more than 6,000 pages) and of far

lower quality than any I have seen before. If it has advanced this far in the ISO process it is because of vendor pressure, not because of technical merit.

What is the problem with a buggy standard? Interoperability suffers. That is the problem. There is no doubt that if everyone in the Commonwealth used Microsoft Office 2007 on Windows Vista, that their interoperability will be good. But as soon as we admit choice in applications and operating systems, then interoperability will only occur when all sides follow a common standard. So the technical quality of a standard (accuracy, comprehensiveness, level of detail, consistency, etc.) is directly proportional to the level of interoperability achievable and the cost to achieve it.

The ISO ballot on OOXML will not end until September 2nd, after which a resolution process to fix defects in the text of the standard will take at least an additional 6-18 months. That is, of course, if OOXML gains ISO approval, something which is not certain at this point. So I would recommend a cautious approach, and wait for the ISO process to conclude, or conduct your own independent technical evaluation of the OOXML specification to confirm its technical quality before adding OOXML to your list. Ask other vendors: Is this something you can implement? Ask yourself: Will this truly give the Commonwealth the interoperability and choice that you desire? These are important questions to ask.

Finally, I'd note that the ETRM also calls out OpenDocument Format (ODF) as an acceptable format. ODF was approved by ISO last year. So why do we need OOXML? I personally think that the complexity of document exchange and translation in a multi-format world would take us back to the confusion and frustration of the early 1990's when we all juggled WordStar, WordPerfect, Word and WordPro files, and could collaborate only poorly. Better to push for a single unified/harmonized standard document format for personal productivity applications, much as we have a single standard (HTML) for web pages.

I'll leave you with a quote from Tim Berners-Lee, the inventor of the web, from an interview he gave with David Berlind from ZDNet when Berners-Lee was recently in Boston receiving a Lifetime Achievement Award from the Massachusetts Innovation and Technology . Berners-Lee said:

“It was the standardization around HTML that allowed the web to take off. It was not only the fact that it is standard, but the fact that it's open and

the fact that it is royalty-free.

So what we saw on top of the web was a huge diversity and different business which are built on top of the web given that it is an open platform.

If HTML had not been free, if it had been proprietary technology, then there would have been the business of actually selling HTML and the competing JTML, LTML, MTML products. Because we wouldn't have had the open platform, we would have had competition for these various different browser platforms, but we wouldn't have had the web. We wouldn't have had everything growing on top of it.

So I think it very important that as we move on to new spaces ... we must keep the same openness we that had before. We must keep an open internet platform, keep the standards for the presentation languages common and royalty free. So that means, yes, we need standards, because the money, the excitement is not competing over the technology at that level. The excitement is in the businesses and the applications that you built on top of the web platform.”

I believe we want to ensure the same qualities in document formats. We want competition and choice among vendors, applications and services, but not among standards. If we compete on standards, then no one wins.

Sincerely,

Rob Weir, 122 Lowell Road, Westford, MA

antic at robweir.com

<http://www.robweir.com/blog>

**From:** [tom rabon](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ETRM V 4.0 Red Hat Submission  
**Date:** Friday, July 20, 2007 3:38:50 PM  
**Attachments:** [MassETRMv4CommentsRevised.sxw](#)

---

Please find comments offered on behalf of Red Hat, Inc. in the attached document. Thank you.

--

Tom Rabon  
Executive Vice President Corporate Affairs  
Red Hat, Inc.  
919/ 754 -4141  
email: [trabon at redhat.com](mailto:trabon@redhat.com)

**From:** [Menard, Joan \(SEN\)](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** From Senator Joan Menard  
**Date:** Friday, July 20, 2007 3:01:54 PM  
**Attachments:** [clip\\_image002.jpg](#)

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The Information Technology Division  
The Commonwealth of Massachusetts  
200 Arlington Street  
Chelsea, MA 02150  
VIA Email: [Standards at state.ma.us](mailto:Standards@state.ma.us)

Re: Information Domain -- Enterprise Technical Reference Model v. 4.0

To the Information Technology Division:

I am writing today to thank you for the work you have done to strengthen the Commonwealth's Enterprise Technical Reference Model (ETRM) Document Formats provision. It had been crucial that the ETRM be modified to best meet the needs of the Commonwealth's diverse workforce.

The ability for agencies to work together and communicate seamlessly is critical to our ability to serve the citizens of Massachusetts. The improved ETRM will create greater interagency interoperability, reduce costly and time consuming duplication of work, and maintain long-term access to government records.

The previous administration acted without a full understanding of the cost of retraining the workforce. That's more money away from vital services that are already under funded and it takes workers away from their primary tasks. Clearly, this was a short sighted policy on both fronts enacted without the input of the workforce and other key constituencies.

Again, I applaud the modifications to the ETRM and look forward to working with your office on this and any future Information technology plans.

Sincerely,

A handwritten signature in black ink that reads "Joan M. Menard". The signature is written in a cursive style with a large, sweeping initial "J" and a long, horizontal tail.

Joan M. Menard  
Senate Majority Whip



**From:** [Thierry Stoehr](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Keep using real Open Standards for Massachussets  
**Date:** Friday, July 20, 2007 2:50:47 PM  
**Attachments:**

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Hello,

I just would like to write how important Massachussets exemple is about the decision to use open standards, even from a foreign country.

I'm french, and since 2005 and the decision to use open standards for the State documents, I quote and write about your decision as a milestone in our digital world: real open standards allow long term archiving, independancy from vendors and control on the State data created.

Those points were in the Massachussets decision in 2005. And you kept this way. Even when the attacks were hard. Even when you refused a first time to accept Open XML on the open standards State list. Even when 5 other States went backwards (Oregon, California, Minesota, Texas and Connecticut).

So am I writing to ask you to keep using real open standards, like Open Document Format, or HTML or PDF.  
But Microsoft Office Open XML is not as a real open format good for the Massachussets.

Thank you for reading and I hope you will keep the way you decided to do.

More than 20 articles about Massachussets,  
<http://formats-ouverts.org/blog/?q=Massachussets>

Sincerely and open formatsly yours,

--

Thierry Stœhr, redactor in chief, <http://Formats-Ouverts.org>

Since 3 years, +1220 articles about open standards

**From:** [James Chamberlain](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Ecma 376  
**Date:** Friday, July 20, 2007 2:36:07 PM  
**Attachments:**

---

Dear Sir or Madam:

I would like to register my opposition to Ecma 376 (OpenXML). The State of Massachusetts should seek ways to make its services and the information it publishes accessible to all its citizens, and not merely those who have purchased the correct version of the correct software on the correct platform. Fully open standards, such as ODF, have the best chance of fulfilling this promise. Proprietary and semi-proprietary formats impose a third party into communications between the State and its constituents. If that third party does not approve of a given platform, through the provision of software supporting that standard, communications between the State and its constituents will be inhibited.

Further, I am concerned about the cost to the State and to the Citizens of the State imposed by proprietary and semi-proprietary standards. As many have experienced with existing software, support for old file formats may be dropped after as few as one intervening version, rendering the old files inaccessible. These files either need to be updated to the new software, which is expensive in terms of both software licensing and personnel costs, or discarded, which is expensive in terms of archiving and the State's ability to preserve the information it needs. Even if a vendor drops support for a particular version of a fully open file format, everything needed to implement full support for that format is still available to the public. With an open file format, the choice between moving forward and losing data versus staying put and losing features need never be made. With a proprietary or semi-proprietary file format, there is always some amount of information about the specification which the vendor keeps to themselves, and thus, some amount of data will always be lost when the vendor drops support for that version of the format.

Thank you for your consideration.

Best regards,

James T. Chamberlain  
20 Eldorado Road  
Chelmsford, MA 01824

**From:** [Byron Reynolds](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ODF and OOSML  
**Date:** Friday, July 20, 2007 2:10:38 PM  
**Attachments:**

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the debate between the ODF and OOXML can be boiled down to this:

Microsoft has a virtual monopoly on making cars that run on Microfuel. Microsoft makes frequent changes to Microfuel so that old cars which are perfectly good no longer run and you have to buy a new Microsoft car. In addition the entry level model only costs slightly less than the fully loaded luxury model.

Someone has now invented Gasoline. Gasoline can be used to run a car built by anyone and its formulation is public knowledge and will not change. Microsoft could easily change its cars to run on Gasoline but has instead chosen to run its new cars on Microfuel Advanced. For certain consideration, which could change in the future, it will also allow competitors to create cars that run on Microfuel Advanced, although no competitor has yet created a car that runs on Microfuel Advanced. Microsoft also reserves the right at any time in the future to modify Microfuel Advanced and can't guarantee that competitors cars will be able to run on modified Microfuel Advanced.

Massachusetts has chosen to have its cars run on Gasoline.  
Microsoft is lobbying hard to have Massachusetts cars run on Microfuel Advanced.

Which fuel would you rather have your car run on?



**From:** [Williams, Tom](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Comment regarding OOXML  
**Date:** Friday, July 20, 2007 1:54:48 PM  
**Attachments:** [lvy.gif](#)

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I quote from Pamela Jones of Groklaw as she states what I feel most pointedly:

"I want a level playing field, so as a customer I can freely choose between all products available.

I don't want to have to use Microsoft products or be dependent on them for anything. I don't mind if I choose to use them, but I don't like to be forced.


Whatever standard is chosen, it should be one that makes it possible for everyone to equally use the standard and get equal results.

OOXML can't offer us that, in that it appears to favor Microsoft, which is retaining certain proprietary information or only making it available under NDA.

As a customer, that bothers me in a standard. I think it should.

And proprietary extensions bother me, even if one can get access up to a point by signing an NDA. No one should have to contact a vendor and sign an NDA to use a **standard**. Period. It puts control of the standard in the hands of a vendor, a single vendor."

Microsoft has done it's level best at obfuscating IT'S reluctance to freely produce details regarding it's proprietary document formats. To not produce those details is to disallow ANY other party the ability to implement a competing product be it a word processor application or document translator.



And to allow ECMA 376 to become a "standard" would be tantamount to signing off on a blueprint that doesn't show where the plumbing or electrical are in a building!

Regards,

Thomas Williams

**From:** [Toby Knudsen](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** comments on MA ETRM 4.0  
**Date:** Friday, July 20, 2007 1:45:09 PM  
**Attachments:**

---

Greetings,

Office Open XML is no kind of standard, but an attempt by Microsoft to hoist their legacy software upon us as if they were providing a neutral structure for developers and users to build upon. I can't imagine that this activity and product corresponds with the State definition of a document 'standard'. ODF document format was available with no strings attached the day this issue arose, and is embraced virtually by everyone else in the software industry.

<http://www.grokdoc.net/index.php/>

[EOXML\\_objections#Cloning\\_the\\_behaviour\\_of\\_proprietary\\_applications](#)

I emphatically urge you to decline Office "Open" XML aka ECMA 376 as an indication that Massachusetts will not be subordinated by its vendors and have State business and expression influenced by an organization that would seek unsolicited, residual profit from State business and expression, and make outlaws of State residents trying to conduct normal State business.

As a descendant (<http://nehgs.org>) of the third signatory of the Mayflower compact I can say that William Brewster paid dearly with jail time for his use of the printing press for our common good. Seeking to avoid paying steep taxes for not attending the Anglican Church, and so that they could worship and express themselves freely, their flight was required because of the restrictions upon language at that time by decree of the King. In that spirit, Massachusetts should continue to use standards and vendors with acceptable ambitions.

[http://en.wikipedia.org/wiki/Mayflower\\_Compact](http://en.wikipedia.org/wiki/Mayflower_Compact)

I appreciate your request for comments on this issue and hope that it is a formality due to any vendor whose format has been recognized by a

standards-body, even if it is an organization with questionable motives and a history of anti-competitive behavior.

Sincerely,  
John Toby Knudsen

59 Fiske Street  
Waltham, MA 02451  
617 233 4002 c

[spelling corrected]



**From:** [Toby Knudsen](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** comments on MA ETRM 4.0  
**Date:** Friday, July 20, 2007 1:42:22 PM  
**Attachments:**

---

Greetings,

Office Open XML is no kind of standard, but an attempt by Microsoft to hoist their legacy software upon us as if they were providing a neutral structure for developers and users to build upon. I can't imagine that this activity and product corresponds with the State definition of a document 'standard'. ODF document format was available with no strings attached the day this issue arose, and is embraced virtually by everyone else in the software industry.

<http://www.grokdoc.net/index.php/>

[EOXML\\_objections#Cloning\\_the\\_behaviour\\_of\\_proprietary\\_applications](#)

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[http://en.wikipedia.org/wiki/Mayflower\\_Compact](http://en.wikipedia.org/wiki/Mayflower_Compact)

I appreciate your request for comments on this issue and hope that it is a formality due to any vendor whose format has been recognized by a

standards-body, even if it is an organization with questionable motives and a history of anti-competitive behavior.

Sincerely,  
John Toby Knudsen

59 Fiske Street  
Waltham, MA 02451  
617 233 4002 c

**From:** [fredd](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** open XML  
**Date:** Friday, July 20, 2007 1:38:11 PM  
**Attachments:** [image001.jpg](#)

---

#### Benefits of OpenXML

Backward compatible with billions of documents

Compact File format – up to 75 percent smaller

Improved damaged file recovery

Easier integration

Safer documents

*\*<http://office.microsoft.com/en-us/products/HA102058151033>.*

*aspx*

Sample comments include:

- 1-**As an international open standard of Ecma International, Open XML meets all state requirements as an open standard. Use of the format will help enable citizens and state agencies to access electronic files well into the future.
- 2-**There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](http://openxmlcommunity.org) and [openxmldeveloper.org](http://openxmldeveloper.org), and many independent developers and their customers are benefiting from this new technology.
- 3-**Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation



Fredd Fishman  
Everything I.T. LLC  
Phone: 203-858-3984  
E-Mail: [freddf@everythingit.biz](mailto:freddf@everythingit.biz)  
Web: [HTTP:// everythingit.biz](http://everythingit.biz)

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.476 / Virus Database: 269.10.10/908 - Release Date: 7/19/2007 6:10 PM

**From:** [rek2GNU/Linux](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [campaigns at fsf.org;](#)  
**Subject:** open document is the real standard.  
**Date:** Friday, July 20, 2007 1:03:56 PM  
**Attachments:**

---

my name is Chris Fernandez,  
1175 boylston st  
Boston 02215

as a MA vote I please urge you to reconsider this.

Despite the misleading name, Microsoft's format is not open. Microsoft has not explicitly granted any rights for vendors other than Microsoft to implement the specification. They expect everyone to trust vague, unusual, and poorly worded promises not to sue. Their proposal conflicts directly with a number of existing and accepted open standards, and so seems quite clearly to be an effort to replace current open standards with something controlled by a single proprietary vendor. Please consider staying with Open Document.

Chris F.

**From:** [rsledd at rcn.com](mailto:rsledd@rcn.com)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Disapprove extension of Enterprise Technical Reference Model  
**Date:** Friday, July 20, 2007 12:52:07 PM  
**Attachments:**

---

Dear Sirs:

I am concerned that the Commonwealth is considering inclusion of ECMA 376 in the Enterprise Technical Reference Model (ETRM) as an alternative to the published ISO OASIS Open document standard (ODF) already accepted by the Commonwealth . As a resident and taxpayer of Massachusetts for more than thirty years, I am deeply troubled that a proprietary format as described in ECMA 376 would be included in a policy intended to make documents broadly available in perpetuity.

ECMA 376 is (at best) an incomplete definition and arguably unworthy of the label 'standard', given the haphazard descriptions and obtuse language used to conceal the proprietary elements in the description. A standard, by definition, should not be proprietary. The very reason for a standard is so that multiple parties may conform to an agreed list of specifications. This result is simply impossible in ECMA 376.

It is virtually assured that certain documents conforming to ECMA 376 will become unreadable in future years, which will either render the affected documents useless or require a massive outlay of tax dollars to convert to an updated document definition. The ODF standard documents do not share this potential liability.

Please reconsider the wisdom of including ECMA 376 in the ETRM v4.0, and postpone that particular addition until ECMA 376 is more completely specified.

Sincerely,  
Franklyn L. Sledd  
Hudson, Massachusetts

**From:** [Joshua Goldberg](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [Joshua Goldberg;](#)  
**Subject:** do not approve ooxml as a Mass. standard  
**Date:** Friday, July 20, 2007 12:36:54 PM  
**Attachments:**

---

The .odf format is better in terms of accessibility, simplicity and openness of its design process than Microsoft's ooxml.

Simply adding another standard to the list of acceptable document formats might seem safe ("there's always odf to fall back on") but it is not without problems. This is true even discounting the serious accessibility flaws of the ooxml standard. People with disabilities, as well as nondisabled users in non-standard situations (reading on the small screen of a PDA, for example) require their software to make adjustments to how the content is displayed (rescaling it for visual impairments, or reading it aloud, for example). Developers of software for these purposes have to specialize for the document format, as well as for the target population, which is often very small. With two standards, rather than one, there will be a need to solve two such software problems for every population, resulting in a loss of quality, speed and availability of software development, spreading a niche industry very thinly.

Besides the problems of multiple standards, ooxml has serious accessibility flaws. It fundamentally lacks semantic information to make it possible to reformat content without altering the meaning. A simple example is that in data entry forms, it lacks a link to connect the form labels to the corresponding entry areas. The reshuffling of elements that can happen with zooming, a small screen, or reading aloud with a screen reader, is impossible to do correctly without this information.

The ooxml format is also highly complex and idiosyncratic in order to maintain straightforward compatibility with microsoft's products. This is inappropriate, and the complexity will make the maintenance

of software to read and work with such documents much more complex that it needs to be.

I am a former resident of Massachusetts attending graduate school in computer and cognitive science in Indiana.

-Joshua Goldberg

1307 S Henderson  
Bloomington, IN 47401  
812 339-7516



**From:** [mrhodin at us.ibm.com](mailto:mrhodin@us.ibm.com)  
**To:** [Standards \(ITD\)](#);  
**CC:** [douglas.rubin at state.ma.us](mailto:douglas.rubin@state.ma.us); [ContactANF \(ANF\)](#);  
[dormitzerh at dor.state.ma.us](mailto:dormitzerh@dor.state.ma.us); [Hart, John \(SEN\)](#); [Bosley, Daniel - Rep. \(HOU\)](#);  
**Subject:** IBM Letter in response to ETRM v4.0  
**Date:** Friday, July 20, 2007 12:31:21 PM  
**Attachments:** [IBM letter re ETRM v4.0.pdf](#)

---

Attached please find IBM's response to the request for comments on ETRM v4.0.

Thank you,  
Mike

Mike Rhodin  
General Manager, Workplace, Portal and Collaboration Software  
IBM  
Five Technology Park Drive  
Westford, MA 01886  
phone: 978-399-5057

From: [Candice Whitmore](#)  
To: [Standards \(ITD\);](#)  
CC:  
Subject:  
Date: Friday, July 20, 2007 12:27:29 PM  
Attachments:

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Dear Sirs,

I read with interest the new version of the ETRM. I was disappointed to read that the state still doesn't "get it" and continues to exclude several document formats and new technologies. The way the policy is currently written excludes any entities that develop new document technologies from doing business with the state because the policy specifically names several document formats as acceptable. If my company developed a new technology that meets the state's goals better and cheaper, we'd have no chance of providing services to the government because our new technology isn't listed in the ETRM. I hope that someone at the ITD "gets it" and changes the policy before it is enacted.

Thank you.  
Candice Whitmore

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PC Magazine's 2007 editors' choice for best web mail—award-winning Windows Live Hotmail. [Check it out!](#)

**From:** [David Oostdyk](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** OOXML is a bad thing.  
**Date:** Friday, July 20, 2007 11:55:48 AM  
**Attachments:**

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To whom it may concern,

I lived in Massachusetts during the time that Peter Quinn was the CIO for the state. I followed closely his pursuit of ODF and found it to be one of the most sensible, enlightened policies to grace the higher levels of state government in a long time. He was looking to truly benefit everyone by promoting an open, unencumbered standard for using and storing information.

Since his departure, which was hastened by what can only be described as "political assassination" by those parties which stood to lose financially by opening document standards, I've seen and read about his original policy on ODF being undermined on several fronts. ODF was the way to go.

I just want to say that it would be a shame to allow OOXML into an area where it clearly does not belong. didn't satisfy the requirements for an open standard then, and it doesn't satisfy them now. It's a solution on paper only. It doesn't solve anything, but it lets you do something that "looks good" to satisfy people who don't understand the issues.

Thank you for your time,  
David Oostdyk

**From:** [Steve Worley](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Comment on MS-OOXML/ECMA 376 from a software developer  
**Date:** Friday, July 20, 2007 11:49:51 AM  
**Attachments:**

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I know you are considering adoption of the MS-OOXML standard. I am a professional software author, and have extensive real world experience in dealing with data, parsing, and formats. However, I asked myself if I were assigned a job to make my application read and use an OOXML file... I couldn't do it. The format specification, even if it's consistent and complete, is just far too large, complex, and filled with a staggering number of arcane details and exceptions to be able to deal with. It's like the US tax code, even a trained attorney could not understand all of it.

A simpler, cleaner, design is easier to read, easier to write, easier to understand, and has a longer lifetime. If a format begins its life as difficult, arcane, and awkward, it will become even more so as it ages.

I know your goal for a file format include ease and breadth of use for users, but please consider the developers who must deal with the format to enable access by users. If the format is so difficult that developers cannot read and write it, then the software will suffer and so will users.

Please do not adopt OOXML.

Steve Worley

**From:** [Simon Kioko](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** OpenXML Support  
**Date:** Friday, July 20, 2007 11:40:22 AM  
**Attachments:**

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Dear Policy Makers:

These are my comments about OpenXML

Benefits of OpenXML:

Backward compatible with billions of documents  
Compact File format – up to 75 percent smaller  
Improved damaged file recovery  
Easier integration  
Safer documents

- 1-**As an international open standard of Ecma International, Open XML meets all state requirements as an open standard. Use of the format will help enable citizens and state agencies to access electronic files well into the future.
- 2-**There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](#) and [openxmldeveloper.org](#), and many independent developers and their customers are benefiting from this new technology.
- 3-**Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Thank you,

***Simon M. Kioko, (MSEE)***

President

Side Technology, Inc

4944 Lancaster Avenue

Philadelphia, PA 19131

[skioko at sidetechnology.com](mailto:skioko@sidetechnology.com)

Tel: 215-473-0110

Fax: 215-473-0220

Cel:267-210-2135

**From:** [Barbara](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ETRM  
**Date:** Friday, July 20, 2007 11:31:31 AM  
**Attachments:**

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To Whom it May Concern:

Thank you for your recent proposed revisions to the ETRM and the opportunity to comment on the changes. I think that the new changes to the ETRM are a step in the right direction, but take some issue with the change to the document formats section. The old version of the ETRM mandated that the acceptable document formats were "open standards." I don't think that the Commonwealth should be dictating one type of document format over another; instead technology policies should be goals-based. Many different types of document formats can meet the state's goals; decisionmakers should look at all of them, figure what meets the stated goals, and make a choice. While I think it's great that OOXML has been added to the list of acceptable formats in the new ETRM, identifying a list of technologies by name seems dangerous to me. Instead the policy should be goals-based and allow for new types of formats that are currently being developed.

Thank you again for the chance to comment on this matter.

Sincerely,  
Barbara C.  
Waltham

**From:** [Susan Romanelli](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** OPEN XML Support Letter  
**Date:** Friday, July 20, 2007 11:26:58 AM  
**Attachments:** [070720 Open XML Letter page 1.jpg](#)  
[070720 Open XML Letter page 2.jpg](#)

---

Dear Ms. Pepoli,

Thank you for adding Ecma 376 to the list of document formats approved for use by public agencies in Massachusetts. Please see my letter attached and have a very nice weekend.

Best regards,  
Susan Romanelli  
Susan Romanelli  
Chief Financial Officer  
Trinity Consulting Inc  
Microsoft Gold Certified Partner  
office (508) 485-8842  
fax (508) 481-6375

<http://www.Trinity-Inc.net>



**From:** [Ed Grimm](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Comment on ETRM 4.0 draft  
**Date:** Friday, July 20, 2007 11:18:37 AM  
**Attachments:**

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To Whom It May Concern:

I've reviewed the ETRM 4.0 draft, and I have a few issues with it. Most of the changes are good, but I believe that several key elements are highly problematic.

**I. EMCA 376 IS NEITHER AN OPEN STANDARD NOR A DE FACTO STANDARD AND ITS USE IS THEREFORE CONTRARY TO PUBLIC POLICY.**

The new ETRM allows for de facto industry standards. However, since Massachusetts state law requires use of open standards when they are available, allowing for de facto standards conflicts with established public policy of the Commonwealth. An open standard needs to be something a person can implement without the direct assistance of the entity which wrote the standard. There are many elements of EMCA 376 which require Microsoft's expertise to implement, and therefore EMCA 376 does not qualify as an open standard. Furthermore, EMCA 376 is nowhere near being an established "de facto standard" yet - in fact, while I work in a Microsoft-dominated company, the only OOXML documents I have seen were ones I specifically sought for purposes of seeing an example of what OOXML is. Since EMCA 376 is neither an "open standard," nor an established "de facto standard," its use would be contrary to established Massachusetts public policy.

**II. MICROSOFT HAS DEMONSTRATED BAD FAITH IN IGNORING INTEROPERABILITY ISSUES AND HAS NEGLECTED TO FIX KNOWN PROBLEMS WITH EMCA 376.**

Because ODF is an open standard, Microsoft should be able to amend it to meet their technical needs. They have not, as far as I am aware, even seriously considered doing so. Instead, their reaction to ODF has been to write a large

document which attempts to look like a format specification. However, this document does not actually disclose enough information to be usable. If they were at all interested in actual interoperability, as they claim to be, then they would have spent at least some time attempting to work with ODF before they spent any time drafting their own 'standard' submission. The very existence of EMCA 376 therefore is evidence of bad faith on Microsoft's part.

Furthermore, EMCA 376 does not interoperate with any other relevant standards of which I am aware; instead, it embodies its own alternate versions of a vast collection of standards. This creates confusion between standards, and it also increases the size of the document, making thorough review difficult. The last time I checked, with regard to EMCA 376, Microsoft had yet to fix any of the issues or problems I've seen reported in public forums. If Microsoft is unwilling to correct issues found in its 'standards', then I do not believe anyone, including the Commonwealth of Massachusetts, should be using their 'standards'.

### III. USE OF MICROSOFT'S EMCA 376 STANADARD SETS A BAD EXAMPLE AND WILL BE UNDULY BURDENSOME TO MASSACHUSETTS TAX PAYERS.

I am a Massachusetts citizen, and a registered voter. I moved here about two years ago, and was very happy to be living in the first state to make an important step towards independence from big business by requiring open software formats when available. The Commonwealth of Massachusetts has a long history of protecting individuals and the common good. Microsoft is a company that has been found guilty of anti-trust violations (See e.g., U.S. v. Microsoft, 87 F. Supp.2d 30 (D.D.C. 2000)). Encouraging this type of behavior is contrary to Massachusetts public policy and association with such companies to an extent greater than is absolutely necessary sets a bad example to citizens of the Commonwealth. Futhermore, due to Microsoft's unwillingness to deal with interoperability issues or to fix issues and problems reported to them, use of EMCA 376 is likely to create technical delays and difficulties that the Massachusetts taxpayers will have to pay for. As such, I strongly urge you to reconsider these elements of the ETRM proposal.

Respectfully,

Edward A Grimm  
100 Landsdowne Street, Apt 1306

Cambridge, MA 02139

**From:** [Roger](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Comments on the Enterprise Technical Reference Model (ETRM) v. 4.0.  
**Date:** Friday, July 20, 2007 11:16:40 AM  
**Attachments:**

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Dear Sirs,

Massachusetts is providing an important public service to America by investigating and committing to standards for government documents, so that they are open to everyone, now and in the distant future.

Whatever standards are chosen, they should be ones that make it possible for everyone to equally use the standards and get equal results. OOXML doesn't offer that, in that it appears to favor Microsoft, which is retaining certain proprietary information or only making it available under NDA. As a customer, that bothers me in a standard. I think it should. And proprietary extensions bother me, even if one can get access up to a point by signing an NDA. No one should have to sign an NDA to use a standard. Period. It puts control of the standard in the hands of a vendor, a single vendor.

I can read a 200-year old piece of paper. I will without doubt be able to read a 200-year old document in ODF format. Will I be able to read (with a free reader) a 200-year old OOXML document? Will the complete standards for that document format be part of the public record, available without an NDA? To date, there is no assurance of this.

Thank you for listening,

Roger Matthews  
21849 SE 274th Lane  
Maple Valley, WA 98038

**From:** [John Horn](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** IT Standards...  
**Date:** Friday, July 20, 2007 11:03:13 AM  
**Attachments:**

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To whom it may concern:

As a concerned citizen interested in both efficiency in government and fairness to all citizens and commercial interests both in and out of the state of Mass., I would like to express my deep concern about the potential adoption of OOXML by Massachusetts. OOXML is clearly not an open format and does not provide legacy document support in an open manner, but rather serves to bind the state more tightly to a single vendor, namely Microsoft.

Massachusetts, like all states, should adopt a truly open document format such as ODF instead of one which is controlled by a single vendor or a consortium of special interests. Massachusetts has in the past made headlines and earned the ire of some special interests by forging ahead with plans to implement standards that are fair and equitable to all, citizens and business interests alike (ODF). This has also earned the commonwealth enormous respect and the gratitude of many, both inside and outside the commonwealth's boundaries.

Please, do not disregard the best interests of the commonwealth and its citizens by adopting anything other than a truly open document standard which is, today, best represented by ODF (Open Document Format).

Thank you.

Regards:

--

John M. Horn

[john.m.horn at gmail.com](mailto:john.m.horn@gmail.com)

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Please, support the mission and staff of your local Child Protective Services office and the Foster Child Care network, they are saving America's children, one child at a time.

**From:** [Morgan Reed](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Comment regarding ETRM v 4.0  
**Date:** Friday, July 20, 2007 10:54:53 AM  
**Attachments:** [070709 ACT comments on ETRMv4.0.pdf](#)

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Thank you for taking comments regarding the revised ETRM (v4.0). If you have any difficulty opening this pdf, please contact me immediately and we will resend.

Morgan Reed | Executive Director | Association for Competitive Technology

+ 1.202.420.7481 | + 1.202.331.2139 (fax) |  
[mreed@actonline.org](mailto:mreed@actonline.org)

**From:** [Randy Lee](#)  
**To:** [standards at state.ma.us](#);  
**CC:** [Courtney Hye](#); [marc.pacheco at state.ma.us](#); [john.hart at state.ma.us](#); [dianne.wilkerson at state.ma.us](#); [DiMasi, Salvatore - Rep. \(HOU\)](#);  
**Subject:** Proposed Policy including Open XML File Format  
**Date:** Friday, July 20, 2007 10:44:24 AM  
**Attachments:**

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Thank you for the opportunity to respond to the Commonwealth's proposal for a policy movement that includes Open XML file types for the creation and storage of office documents such as text, spreadsheets, and presentations. In September 2005, we responded with comments to the then-proposed Open Standards/ Open Source policy, and appreciated the open approach that the Commonwealth continues to take by inviting comments and support.

ASAP Software has been the COTS software provider for the Commonwealth of Massachusetts for over 10 years and has the potential for future extensions. As an IT supplier to the Commonwealth, I'd like to preface my remarks with the understanding that as ASAP serves the market, we are always making the best interest of its customers a top priority.

ASAP Software is supportive of the Commonwealth's new proposed policy that supports Open XML file formats. ASAP believes this policy will be beneficial to the Commonwealth and its constituents because Open XML file formats will increase user options as well as enable interoperability and backward compatibility.

This proposed policy reflects an implied understanding that various users have different technology needs. In ASAP's 20 years of experience serving the IT market, we have worked with many customers, all with unique IT environments. These customers often select different combinations of



products to meet their needs. We believe that continuing to expand user options will promote the free enterprise system and result in a set of IT standards that meet the growing need of the user community.

The acceptance and implementation of Open XML file types will provide each user with their necessary technology arrangement, facilitating their efficiency and effectiveness individually, thus avoiding a “one-size-fits-all” scenario. This is important because different users have different technology requirements, and multiple applications and file types are in use in different areas of an organization. The larger an organization becomes, the more variety exists.

Because of Open XML’s interoperability, or ability to share data in common formats, it will enable the Commonwealth to increase productivity and efficiency, and ultimately improve public accountability. Even though different applications will be installed, users – regardless of their applications – can quickly and easily view the data saved from other arrangements through files saved in Open XML format.

Open XML’s backward compatibility helps to maintain document integrity that would otherwise be at risk without this policy. The reality is that millions of documents circulate through the Commonwealth both internally and externally every year. As technology advances with new applications and file types, old file types can create problems for data retrieval without backwards compatibility. Therefore, backward compatibility is critical, and this proposed policy to include Open XML will ensure that the Commonwealth will preserve data integrity and avoid the risks and costs associated with loss of accountability and critical data.

In the past the Commonwealth has invested heavily in information technology at all levels. Most of these choices were driven by product evaluation – that the chosen application was the best product on the market which would best meet the organization and user’s specific needs. The proposed policy enables the Commonwealth to continue its return on investment already made into currently implemented technologies, while concurrently acknowledging the unique needs of thousands of users with a

cost effective, non-restrictive solution that achieves the Commonwealth's goal of interoperability.

ASAP will be ready and available to help the Commonwealth agencies and organizations ensure that interoperability goals are met for both the Open XML movement and for proprietary products already in place. We will continue to assist in helping the Commonwealth best manage the needs of their IT and purchasing community. We value our long-term relationship with the Commonwealth, and look forward to working with you in the years to come.

Randy Lee  
VP Government, North America  
ASAP Software®  
Software | Hardware | Solutions

850 Asbury Drive  
Buffalo Grove, IL 60089  
Direct phone: 224.543.5900  
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Fax: 847.465.3277

[www.asap.com](http://www.asap.com)

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**From:** [Robinson Tryon](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Public Comment on ETRM Draft 4.0  
**Date:** Friday, July 20, 2007 10:24:33 AM  
**Attachments:**

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Dear Sirs,

When I originally heard that the Massachusetts Information Technology Division had adopted a formal policy giving preference to the use of open file formats and open standards I was pleasantly surprised. The importance of using open file formats to ensure interoperability, to provide competition between vendors, and to allow for long-term archival of information has long been known to persons in the field of IT. However, until Massachusetts' policy was enacted, I don't believe any other state or large organization had recognized and dealt with the information interchange issues inherent in the use of proprietary and closed file formats.

As a strong believer in open standards, I am very pleased to hear that Massachusetts is continuing to phase-in technologies supporting open standards while phasing-out technologies which only support closed, proprietary standards. I am concerned, however, about the ITD's adoption of Microsoft's OOXML file format (ECMA 376) as an acceptable open file format.

There are several reasons why OOXML should not be recommended by the ITD for use in Massachusetts. Chief among these reasons are the following:

-- The OOXML file format should not be considered an "open file format" because parts of the OOXML specification include references to proprietary/closed interfaces and software written by Microsoft that are not available freely available such as "lineWrapLikeWord6" and "useWord97LineBreakRules". It is technically impossible to write software that correctly interprets the entire OOXML specification without this proprietary information.

-- The OOXML file format specifically supports the embedding of certain files encoded in closed, proprietary formats. Even if the OOXML "wrapper" around embedded data is in an open format, the data inside is just as inaccessible as if OOXML itself were a closed format.

-- OOXML does not correctly implement time/date functions. OOXML's serial time format requires that implementations give the INCORRECT time in certain cases (for backwards compatibility) including specifying the year '1900' as a leap year. Instead of fixing a bug that has been propagated through several pieces of software since Lotus 1-2-3, and instead of using the industry standard for storing date/time information, ISO 8601, the OOXML file format redefines the whole calendar. I am flabbergasted that the drafters of OOXML would take such a lazy and reckless approach to designing a specification.

-- Before they created and standardized the OOXML file format, Microsoft refused all invitations to participate in the drafting of the OASIS Open Document Format, an open file format which provides similar facilities to OOXML. The principal reason for the creation of ODF was that there existed no open standard for the storage of office documents. Microsoft, developer of the most widely-used office productivity software in the world and (already) a member of OASIS, decided not to participate in the creation of ODF. Why didn't they participate? Why do they still refuse to participate in the standardization process?

-- Although Microsoft has recently made statements in support of open standards it has shown no long-term commitment to the creation and promotion of open file formats, and in fact has a long history of perpetuating the use of proprietary, closed file formats and refusing to share information, even when requested. Even though the current version of OOXML is available under a moderately open license, Microsoft has made no commitment to make future versions of the OOXML file format open for all to implement.

In conclusion, Microsoft has taken a truly huge step towards the standardization of office file formats by releasing the OOXML specification. The permissive licensing of OOXML is a direct result of Massachusetts' decision to choose open file formats over closed

file formats and is a testament to Massachusetts' clout in the marketplace. However, the fact that the OOXML format is not yet completely open, the fact that OOXML incorporates time/date bugs, and the fact that Microsoft is still dragging its feet on interoperability and is refusing to fully cooperate with other players, indicates that the OOXML file format should not be recommended for use in Massachusetts' ETRM.

Sincerely,

Robinson Tryon  
New Hampshire

**From:** [Bill Allan](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [Pepoli, Bethann \(ITD\); Joe Lazzaro; Linda Hamel; Bob Hachey; Bob Hachey; Jerry Berrier;](#)  
**Subject:** ETRM 4.0  
**Date:** Friday, July 20, 2007 10:11:39 AM  
**Attachments:** [ETRMLetter072307.doc](#)

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Our comments are attached in a letter.

**From:** [Rob Heiser](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** OpenXML  
**Date:** Friday, July 20, 2007 9:32:53 AM  
**Attachments:**

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Commonwealth of Massachusetts,

There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](http://openxmlcommunity.org) and [openxmldeveloper.org](http://openxmldeveloper.org), and many independent developers and their customers are benefiting from this new technology. As a developer of web based applications it is important that we have this standard adopted so interoperability is definite and possible.

Thanks,  
Rob Heiser  
President  
WiredViews, Inc.  
<http://www.wiredviews.com>

**From:** [Daniel Lescohier](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ETRM v4.0 draft review  
**Date:** Friday, July 20, 2007 9:26:42 AM  
**Attachments:**

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I am a software engineer living in Brighton, Massachusetts, with over 10 years of employment in IT.

In my opinion, Ecma-376 is not yet ready for adoption as a document standard by the Commonwealth of Massachusetts. The Ecma standardization process for Ecma-376 was done quickly, with limited review. Now that Ecma-376 is submitted to the ISO standardization process, flaws are emerging in the standard. I will cite just a few examples.

The current version of Ecma-376 declares a tag named "autoSpaceLikeWord95." However, it does not define the "auto spacing" rules for this tag in the standard. According to Stephen McGibbon of Microsoft, in a meeting with the Portugal CT-173 ISO Technical Committee Meeting on July 16, one should run a Microsoft application to measure the spacing applied for this rule.[1] However, the point of an open standard is to define these rules in the standard. The strange thing is, that Microsoft's applications must have these rules defined in their applications, in order to auto space the text correctly. So, the rules are defined in their application, but it's not defined in the standard. It's locked up in Microsoft's proprietary source code, without a definition in the open standard. There's actually no need for such a tag as "autoSpaceLikeWord95." Since the rules are in Microsoft's application, instead of serializing the text using an "autoSpaceLikeWord95" tag, the application could define a style implementing these spacing rules, and when serializing the document, save the style definition in the document file, and save the text, applying the style to the text.

The current version of Ecma-376 declares other tags, that are similarly not defined, such as "chicago", "ideographDigital", and "ideographLegalTraditional."

Also, the current version of Ecma-376's spreadsheet formula definitions are



deficient and inaccurate, as explained in [2].

Both the United States and South Africa ISO Technical Committees have voted against approving Emca-376 as an ISO standard. Significantly, there is only one implementation of the Ecma-376 standard, while there are many implementations of the ISO ODF standard. At this point, it is too early to be sure that Ecma-376 will be adopted by many implementations, and therefore be a true standard with multiple choices of software.

Therefore, I think it's too early to adopt Ecma-376 as an open document standard. It's the special duty of government to have it's documents viewable by it's citizens, so it's important that the Commonwealth of Massachusetts store it's documents in a truly open format, in order to protect our democratic institutions.

Thank you for your time,

- DL

[1] <http://www.groklaw.net/article.php?story=2007071812280798>

[2] <http://www.openmalaysiablog.com/2007/07/mathematically-.html>

**From:** [Walter Corcoran](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Revised Standards  
**Date:** Friday, July 20, 2007 9:20:21 AM  
**Attachments:**

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I'm impressed with the work and direction of the new standards document. The more inclusive stance on standards for documents and data allows many more small and intermediate size companies to communicate and do business with the state. Most of these companies don't have the resources to research the issues and to build their own "open source" environment. This recognizes that these companies typically use standard "Shrink Wrapped" software out of the box and are not familiar with underlying structures.

Thanks for your efforts.

Walter Corcoran  
Managing Partner  
Boston Data Group, Inc.

**From:** [Keith Richtman](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ETRM v4.0  
**Date:** Friday, July 20, 2007 8:42:04 AM  
**Attachments:**

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Hi,

I am an engineer working and living in Somerville, MA opposed to the inclusion of Microsoft's ECMA 376 in ETRM v4.0. I think the opponents of these additional standards have made many good points I don't feel a need to repeat them here. One such opponent posted his comments here: <http://pingswept.org/2007/07/08/ooxml-is-not-fully-documented-by-ecma-376/>

I encourage you to reconsider the inclusion of Microsoft's ECMA 376 in ETRM v4.0 and continue your support of open standards not affiliated with any one software vendor.

Thanks,  
Keith Richtman  
324 Washington St.  
Somerville, MA

**From:** [Bob F](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Open Formats and "Open" XML  
**Date:** Friday, July 20, 2007 8:21:05 AM  
**Attachments:**

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Robert Fischer  
63A Highland St.  
Roxbury, MA 02119  
617-308-0436  
[citibob at comcast.net](mailto:citibob@comcast.net)

To whom it may concern:

I am a MA resident, and also an IT professional with a PhD in Computer Science from Harvard University. Among other things, I am actively developing and deploying IT software and solutions --- including database application development --- for organizations in Massachusetts.

I have been following the state's shift to open formats from the beginning. Maintaining open formats is important for the long-term survival of our government documents. Truly open formats such as HTML have delivered great value to the Commonwealth, and I believe that open document formats such as OASIS ODF will do so for office documents in the future.

Unfortunately, the most recent "Enterprise Technical Reference Model v. 4.0 Public Review Draft" has serious problems. Specifically, despite its name, there is serious concern that Microsoft's Open XML format is not really open in any real, practical sense. As of today, there is only one implementation of the format, and it is proprietary and possibly patent-encumbered. It is not at all clear whether it is even possible to implement the format in a non-proprietary product --- a critical point for any so-called "open" format. There is ongoing concern about anti-GPL clauses that seek to limit the ability of GPL software to implement MS-OOXML.

From the beginning, it has been clear that this issue is about FORMATS, not

specific software packages. File formats will be with us forever, long after the software we run today (or tomorrow) will be gone. The lack of good implementations of an open format such as ODF might be a reason to delay adoption of that format until the software improves --- but it is NOT a reason to water down the state's definition of "openness," sacrificing the future for a dubious cause in the present.

It is also important to look beyond the office suite as the canonical software to read and write these formats. Although an open format might provide greater vendor choice for office suites in the future, that is the smallest potential benefit from making such a choice --- MS Office works very well for what it does, and users are happy.

More important are the possibilities opened up for document processing by software systems OTHER than the office suite. This will become increasingly important as we seek to index, process, manage and otherwise automatically deal with terabytes of state archives. An amazing ecosystem of HTML production and processing software and software components --- both open source and proprietary --- has sprung up around the open HTML format. Custom programs to process HTML documents in custom ways can be quickly and cheaply developed, built upon a variety of common, open source HTML processing libraries. We can expect the same to develop around ODF, with great potential benefit to the state of Massachusetts. (Incidentally, I have chosen ODF as a report output format for a system I'm currently writing for precisely this reason --- libraries to generate reports in ODF format were freely and easily available.)

Therefore, I urge the greatest caution in considering the upcoming shift to open formats. Specifically, I urge you to consider the following questions when considering whether "Open XML" is "open" in anything more than name only:

1. Is the MS-OOXML specification free from any references to particular products of any vendor and their specific behavior?
2. On the grounds of the existing MS-OOXML specification, can any third party regardless of business model, without access to additional information and without the cooperation of Microsoft implement full backward compatibility and conversion of such legacy documents into MS-OOXML comparable to what Microsoft can offer?

3. Does MS-OOXML allow proprietary extensions? Is Microsoft's implementation of MS-OOXML faithful, i.e. without undocumented extensions? Are there safeguards against such abusive behavior?
4. Why did and does Microsoft refuse to participate in the existing standardization effort? Why does it not submit its technological proposals to OASIS for inclusion into ODF?
5. Does Massachusetts have its own, independent legal analysis about the exact nature of the grant to certify whether it truly covers the full spectrum of all possible MS-OOXML implementations?

Unfortunately, I believe MS-OOXML falls short on a number of these questions; but I urge you to do your own independent review. Even if the answer is no to just one question, that would still be reason enough to disqualify it from "open" consideration.

Reading through the ETRM draft, much was made about XML. This is not the main issue. The basic XML specification is truly open, but it is easy to build proprietary, patent-encumbered XML-based file formats. It is also possible to build open non-XML-based formats. We need to focus on the openness of the final file format, not the specifics of whether it is encoded XML. XML is after all just another technical tool. In any case, both OASIS ODF and Microsoft OOXML are encoded in XML; but again, just because they use XML says nothing about their openness as formats.

I am also highly disturbed by Microsoft's heavy lobbying on this issue and otherwise interfering with the democratic process in the state of Massachusetts. I am sickened by the double-speak of lobbying organizations like "Initiative for Software Choice", which make mincemeat out of terms like "choice", "monopoly", "standard", "open", etc. It is truly Orwellian. I don't know what back-room deals, arm-twisting and veiled threats have come from Redmond so far. But as a citizen, I can assure you, it smells very bad. We are governed by a democratically elected government, not by a corporation from the other side of the continent. I thought we were better than that as a state.

Given the serious concerns, I am coming to believe that delaying the transition to open formats might be the best choice --- open formats for office documents are still in their infancy, and I expect the software infrastructure around them to

improve significantly going forward. Although there is debate and uncertainty now, things will look very different in 1-3 years. By that time, we will have seen the following:

1. Microsoft's own ODF converter will be working and well tested, providing good support for a true open standard (ODF) inside of Microsoft Office.
2. We will see increased amounts of software and software components that allow automatic processing of ODF format documents.
3. We will have further experience, having watched other governments around the world adopt ODF.
4. Vendors other than Sun will have had a chance to produce additional software that reads and writes ODF format documents.
5. Accessibility issues with ODF software will be improved.
6. We will have a better idea whether or not Microsoft's "Open XML" format is really open --- as various proprietary and non-proprietary projects seek to implement it.

At that time, many of the questions we're debating today will be answered, and we will be in the position to make a much more informed decision. Commitment to an open format is a long-term issue, and a few delays to get things right and get good consensus won't hurt in the long run.

In summary: This is about file formats, not specific software packages or vendors. A truly open file format will have long-term positive consequences for the state, far beyond simply what office suite sites on end users' desks. No one is debating whether or not ODF is truly open; however, there is serious concern about the actual openness of Microsoft's "Open XML." Microsoft has further muddied the waters by engaging in heavy lobbying to undemocratically sway the decisions made in the state of MA. Therefore, until there is widespread consensus among all parties --- including multiple proprietary and open source vendors --- regarding the "openness" of Microsoft's so-called OOXML, I strongly recommend that we DO NOT adopt MS-OOXML as standard for Massachusetts. We should also consider delaying the shift to open formats by 1-3 years as the ODF ecosystem matures.

Sincerely,  
-- Robert Fischer

**From:** [Tom Evans](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Review Comments for Draft ETRM 4.0  
**Date:** Friday, July 20, 2007 5:48:26 AM  
**Attachments:**

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July 20, 2007

Information Technology Division  
Commonwealth of Massachusetts  
Attention Beth Ann Pepoli

Re: Public comment on ETRM Draft 4.0

Dear Ms. Pepoli,

I have reviewed a number of detailed letters sent you your office and also published on line (e.g. Andy Updegrave's letter of July 8) that speak to all of the explicit reasons not to adopt the draft ETRM 4.0 changes allowing ECMA standards and Microsoft's Office File Format (OFF) (AKA OOXML AKA ECMA-376).

Besides the shortfalls of OFF as a "standard" (Dates are wrong, references to unpublished formats, 6000 pages when 600 should do, not well formed XML) it fails all explicit standards-adoption criteria developed by your organization via industry best practices and internal consensus.

In this note, I will try to address implicit reasons for stepping back from this now very public draft "proposal".

The sweeping aside of your organization's principled decision to define, on behalf of Massachusetts citizens now and for years to come, the specification for public records is the clearest example of unjustified response to some external force or



short term interest as can be found.

The rewrite of ETRM 4.0, allowing ECMA “standards” and Microsoft's Office File Formats (OFF) does not just add an “option”. It undoes all of the rest of the work and value of the last many years of industry leading Enterprise Architecture.

Dueling “standards” are no standard. ETRM 4.0 delivers No consistency, No predictability, No ability to select enterprise technologies designed to inter-operate with All documents. As your architecture shows, the information model is a Service Architecture enabler – if a common language is present.

As a software architect with 12 years of life critical medical software experience and another 15 years of Fortune 100 enterprise architecture experience, I have been taught to look for risks to projects, their customers, and to the business at large.

Transitioning to open standards is just work. The technical issues are not life-critical to your business, they are just tasks to be accomplished. However, publicly committing to truly open, multi-vendor standards and then stepping back into the arms of Microsoft's lock-in business model appears to raise questions of risk to the overall goals of your enterprise architecture and questions of business and legal risks to the Commonwealth of Massachusetts.

Lydia, my business mentor said: *When you don't understand the behavior, check the compensation plan.* The lesson was about sales people canceling and restarting a service rather than issuing change orders... “New” service orders earned an extra \$50. No real harm once the the light of day fixed the behavior.

**\*Public Commitment\***

The current public ETRM defines a road map for your overall enterprise architecture that invites open “level playing field” collaboration by all of your information technology suppliers, all citizens, and all businesses that interact with the effected areas of the government of Massachusetts. That road map defines Open Document Formant (ODF) as the common language for business to business, business to Citizen, and Desktop to Systems, and Systems to Systems interaction. I expect that this very public invitation, including multiple years of

public internal consensus building and public explanation has had a real business impact on your own departments, their suppliers, and the business and citizen customers that interact with these areas of Massachusetts.

\*Tools for Lock-in: OOXML is not a Standard\*

I hold the position that Microsoft's Office File Format (OFF), given the marketing label of Open Office XML is not “truth in advertising”.

OFF formants are not open, not by your own definition and requirements. They are part text/“XML” (maybe the “open” part?) and part references to non-disclosed proprietary formats and binary “blobs”. It is patent encumbered, even considering the patent pledge which others have challenged in detail.

They are not exact XML – not all content is XML, and the XML has been found to not be well formed or “sane” (Again, you have other letters that address this in detail, if not from internal evaluations).

To call the OFF a “Standard” because ECMA stamps its name on it is to ignore the whole point of standards making as a process that arrives at a common good. ECMA is clear about its goals of turning a vendor document into a “standard” - unchanged. And, for Microsoft to engage in packing the government ISO approval committees with Microsoft business partners is to assert that Microsoft, as a company, somehow has the right to wage control over the representatives of citizens and nations. Check the compensation plan.

OFF also creates a barrier to non Microsoft suppliers and collaboration due to the nature of partially documenting contradictory behavior. Groklaw.net (and Kenya, as part of registering contradictions in the ISO process) have published extensive detail on aspects of OFF that fail simple tests of correctness. For example, what kind of year is 1900? How is Word 95 formatting defined? Paper sizes? Identifiers for Nations? When is the weekend?

At over 6000 pages, the “documented” office file format appears to be intentionally obscure, the exact opposite of the goals of a state government information architecture specification. Assuming you want a healthy competitive eco-system of suppliers for desktop and enterprise tools for the long haul, you

want, as you have stated, single open standards designed for interoperability. Check the compensation plan.

**\*Lock-in, Lock-out\***

For citizen / consumers, we fight the forced upgrade due to artificial file incompatibility. I use the very same features in Visio and Word that I used in 2000. However, I have to “upgrade” to programs that are intentionally and artificially not backwards compatible because my customers were forced to upgrade. I HAVE CHECKED THE COMPENSATION PLAN, and this document was prepared with an ODF compliant tool.

The lock-in businesses model is one where, when any one technology or product of a vendor can become entrenched, and due to interlocking features with other products of the same vendor, create dependencies that lead one department after another to adopt single vendor solutions as a way of dealing with immediate local pain/needs. This is at the expense of greater good for the organization and its customers. Your Enterprise Architecture effort (along with most big business and the federal government) is there to design long term benefits into your infrastructure, avoiding self serving (vendor driven) and cost and risk creating local decisions.

This then creates lock-in for Microsoft and lock-out for other vendors. Even if the OFF/OOXML never changed, the Microsoft first, Microsoft only (in practice, converters don't count) nature of using OFF in your enterprise would lock out those other vendors you have already publicly invited in. This is the business model that is well practiced and has earned Microsoft the status of a convicted predatory monopoly. Check the compensation plan.

Should Microsoft choose (and it is their choice to make) to offer ODF conforming tools I suspect you might just buy some. If not, a other Massachusetts, Minnesota, and world wide suppliers will beat a path to your door to meet your current well defined specifications.

I am a citizen of the state of Minnesota. I am exactly like any of your citizens, with the same needs and expectations from my government.

However, you have already promised, in writing, to your citizens and local businesses that enough is enough.

Thank you for accepting public comments.

Tom Evans

**From:** [MBR](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** "Microsoft Office Open XML" must NOT be an acceptable format for Mass. govt. business  
**Date:** Friday, July 20, 2007 3:51:33 AM  
**Attachments:**

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I just learned that you're taking comments on the Enterprise Technical Reference Model through July 20 (today). The standard that Microsoft calls "Office Open XML" is deceptively named. It is most emphatically NOT an open standard. Declaring it a permissible standard for use by any branch of government in Massachusetts would violate the state's responsibility to maintain records that are publicly accessible. Ms. Bethann Pepoli's claim that Open XML "meets the commonwealth's criteria for an open standard" (as reported in <http://www.macworld.com/news/2007/07/02/openxml/index.php>) is absurd. There's a lot more to being open than simply being publicly available. This "standard" was most emphatically not "developed by an open community" as required by the Massachusetts' criteria for an open standard. It was instead developed entirely by Microsoft, and rammed through a second-tier standards body which they dominated. There was no open community process involved in the development of the standard. And Microsoft has not granted any rights for anyone other than themselves to implement "Open XML". As such, it is little more than a cynical ploy on the part of Microsoft to seize control of at least some, if not all, documents stored in "Open XML" format. The government of Massachusetts can work for the citizens of Massachusetts, as it's supposed to, or it can work for Microsoft Corp. It cannot do both.

Mark Rosenthal  
Software Engineer (over three decades experience)

**From:** [Bill Evans](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Comment on MS OOXML vs ODT  
**Date:** Friday, July 20, 2007 2:21:18 AM  
**Attachments:**

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I'm a citizen of Washington state, not Massachusetts, but I would like to offer my comments on the debate over Microsoft's "Open Office XML" vs ODT, for whatever they may be worth. I have followed, with great interest, the proposals to require open standards for certain state documents.

As a software developer, I have had some experience with Microsoft's approach to standards; let me relate two instances. First, in the mid- to late-90's, when Unix servers dominated the "big iron" market, Microsoft encouraged and assisted (through documented interfaces and protocols) the development of Samba, a product which enables file sharing between Unix and Windows computers. By the early 2000's, however, Microsoft seemed to be hindering the development of Samba; the protocols needed to interoperate were no longer well documented. What was the difference? As Windows gained market share, Samba was seen not as a tool to bring Windows into a Unix environment, but as something which would enable Unix to run in a Windows environment. That is, of course, a very good thing for customers, but possibly not the very best thing in the eyes of a Microsoft executive.

The second instance is one in which I was rather directly involved. As Microsoft released the first version of the .Net Framework in 2001, they submitted its file format and semantics to ECMA for standardization. I and many others were delighted – with .Net as an approved standard, third party tools, or even alternative implementations would be possible, allowing competition and synergy, and leading to a rich programming environment. Later, in 2005, version 2.0 of .Net, required incompatible changes to the file format. Microsoft made these changes without consultation with, nor consideration of, any affected parties. It was clear that Microsoft considered the file format theirs to change at will. (In their defense, they did take those changes to ECMA for inclusion in an updated standard.)

It is quite clear to me that Microsoft will work with standards, standard

committees, and standardization processes when they think that those will help advance their business. But if breaking with standards will lock in customers, or even make a new version more convenient to develop, they will make such a break.

I have no doubts that you understand the technical merits of ODT better than I do, and that you understand the shortcomings of the 6000 page MS OOXML specification far better than I ever could. But I know that you are absolutely right to insist on true open standards for state documents. And I am convinced that Microsoft will never really play by the rules of open standards. Microsoft takes a frighteningly short-sighted, self-centered view, and will casually sacrifice the good of their customers for any perceived benefit to themselves.

I wish you the utmost success in implementing true open standards for the citizens of the State of Massachusetts! The rest of the nation is watching.

Best regards,

William Evans  
15315 160th Ave NE  
Woodinville, WA 98072

**From:** [Roger Stewart](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Public Comment on ETRM Draft 4.0 - re Microsoft's OfficeOpen XML specification (Ecma 376)  
**Date:** Friday, July 20, 2007 1:48:07 AM  
**Attachments:**

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Public Comment on ETRM Draft 4.0 - re Microsoft's OfficeOpen XML specification (Ecma 376)

I live in Austin, Texas, not Massachusetts, but I write to applaud your Commonwealth's studious inquiry into and dedication toward meaningful open standards.

I also write as a Mac OS user concerned by Microsoft's seemingly half-hearted and already troublesome implementation of OOXML file format converters. The Microsoft Office Open XML File Format Converter for Mac has already been unduly delayed and, even now, is still only in beta release. As a Mac user, I obviously must wonder if this is due to Microsoft's desire to protect its Windows OS.

Furthermore, it is disturbing that so many problems continue to exist with the Converter for Mac, both as admitted by Microsoft and as documented by Mac users in online blogs and news articles. This early real world history, at a time when one would expect Microsoft to be "on its best behavior," certainly gives an observer reason to question how quickly others will be able to develop, modify, test, and implement viable converters - considering that even Microsoft itself has experienced extraordinary troubles and delays, despite its enormous resources and long experience with the code.

Because countless Windows users seem unaware of how to unchain a "\*.docx" file from its shackles, many Mac users are unfortunately confronted with the intolerable predicament of still not having reliable access to a supposedly open file format.

I believe there are also many, many other reasons that the Massachusetts Information Technology Division



should not add Ecma 376 to its list of approved open standards, and I hope that other commenters are making those points.

I also hope that Texas will follow the lead of Massachusetts in regard to your innovative and competition-enhancing decisionmaking process on this issue.

Thank you,  
Roger Stewart  
Austin, Texas

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<http://sims.yahoo.com/>

**From:** [matt at osource.org](mailto:matt@osource.org)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Public Comment on ETRM Draft 4.0  
**Date:** Friday, July 20, 2007 12:45:38 AM  
**Attachments:**

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Information Technology Division  
Commonwealth of Massachusetts  
Attention: Beth Ann Pepoli

Re: Public Comment on ETRM Draft 4.0

Dear Ms. Pepoli:

My name is Matt Dew and I would like to comment on ITD's decision to include Microsoft's Office Open XML (OOXML) document format (also known as Ecma 376) to its list of approved "open standards".

In the interest of openness, I am an electrical engineer by trade. I work for a small aerospace company in Colorado. I have no direct connection to any of the people or companies involved, other than I use some of their products. While I do not reside in Massachusetts, I feel that the decisions you are making now have far-reaching implications and enormous consequences. I speak for myself and with honesty.

I urge ITD to not add Microsoft's Office Open XML (OOXML), Ecma 376, to its list of approved open standards.

ITD already has an accepted open format called Open Document Format, ODF, which was ratified as an ISO standard ISO/IEC 26300:2006.

Rejecting OOXML will not hurt Microsoft, the marketplace or people who want truly open access to information. Approving OOXML will help only Microsoft and hurt all those others as well as ODF adoption.

I have several worries about trying to pass off OOXML as an 'open' format.

1) Is there a proven path for getting new features into the specification?

OOXML - no

OOXML has no path for getting new features into the specification.

Example:

During the Ecma request for comments period on OOXML, a list of 19 contradictions were registered including Microsoft Excel reporting 1900 as

a leap year. Microsoft made no changes to the specification itself but rather justified why it was done this way. This demonstrates that they do not consider OOXML an open standard but rather their standard that they are 'sharing' with others.

ODF - yes.

ODF has a proven path.

Example 1:

The disabled community had some comments on the initial revision of ODF, v1.0. OASIS worked with the disabled community and incorporated many of their suggestions into version 1.1, which was released in February 2007.

[http://blogs.zdnet.com/BTL/?page\\_id=2173](http://blogs.zdnet.com/BTL/?page_id=2173)

<http://www.oasis-open.org/news/oasis-news-2007-02-14.php>

Example 2:

Some people have started to complain that ODF does not have mathematical functions properly defined. OASIS created a committee to deal with this called OpenFormula. They have been working on this and expect to their work to be included in ODF v1.2

[http://wiki.oasis-open.org/office/About\\_OpenFormula](http://wiki.oasis-open.org/office/About_OpenFormula)

[http://www.oasis-open.org/committees/documents.php?wg\\_abbrev=office-formula](http://www.oasis-open.org/committees/documents.php?wg_abbrev=office-formula)

ODF helps the marketplace and open governance because anyone on the OASIS committee can submit a feature and everything is done in public. The committee decides if it is important. Nothing is closed and all members have equal access to currently pending items.

OOXML hurts the marketplace and open governance because only a very selective committee deems a feature important enough to be included. If a competitor has a good idea it must submit the idea to the committee and nothing prevents the committee members from deciding the implementation of that feature. It's too easy for that improvement to end up in their product first, thus eliminating competition.

2) How does an organization or company join the governing committee of a particular format?

OOXML - Ecma TC45 is the technical committee responsible for OOXML. Ecma membership is decided by existing members. A two-thirds majority is needed for new member approval.

ODF - OASIS is the consortium responsible for ODF. Membership is open to anyone. Processing of membership application takes 3 business days.

ODF helps the marketplace and open governance because anyone can join and have a say in what is considered important.

OOXML hurts the marketplace and open governance because the committee that

controls the format now is within a very expensive and selective organization - Ecma. It remains to be seen how much this situation would change, if/as/when ISO/IEC approves OOXML. If there is a feature that Massachusetts deems important but committee does not, what happens to Massachusetts?

3) How do you verify that a generated file is valid?  
OOXML - you have to one vendor's tools, as currently there are no other implementations of OOXML.

ODF - There are tools available for verification.

<http://opendocumentfellowship.org/validator>

<http://odf.cita.uiuc.edu/>

ODF helps the marketplace and open governance because there are 3rd party tools to generate and verify ODF files. ODF has been designed with 3rd party tools in mind. The possibilities for small companies to create applications that create, translate and process ODF files are enormous and numerous. Using the validators mentioned in the previous paragraph, anyone can create these tools on any platform.

OOXML hurts the marketplace and open governance because there are no 3rd party tools to verify generated OOXML files. You must use one company's tools to verify OOXML files. This ties both the government and private sector users of those tools to one company.

4) If the format or specification is not 100% self-contained, does it reference other specifications that are wholly defined or themselves reference other such items?

OOXML - no. OOXML references application functionality such as:  
lineWrapLikeWord6 - Emulate Word 6.0 Line Wrapping for East Asian Text  
mwSmallCaps - Emulate Word 5.x for Macintosh Small Caps Formatting  
shapeLayoutLikeWW8 - Emulate Word 97 Text Wrapping Around Floating Objects  
truncateFontHeightsLikeWP6 - Emulate WordPerfect 6.x Font Height Calculation  
useWord2002TableStyleRules - Emulate Word 2002 Table Style Rules  
useWord97LineBreakRules - Emulate Word 97 East Asian Line Breaking  
wpJustification - Emulate WordPerfect 6.x Paragraph Justification  
shapeLayoutLikeWW8 - Emulate Word 97 Text Wrapping Around Floating Objects  
These are impossible for 3rd parties to implement.

ODF - yes. ODF either specifically defines internally or references other formats and specifications rather than re-implementing them.

ODF helps the marketplace and open governance because there are no elements like "do this like application y". Everyone is on equal footing.

OOXML hurts the marketplace and open governance because there are multiple elements like the above. Only the company that writes application Y can know exactly and for sure how application Y works. Also, OOXML redefines or contradicts other widely used standards. Scalable Vector Graphics (SVG), and MathML to name two.

Massachusetts has a "decision process for recommending a standard/specification as an enterprise standard" flowchart for deciding whether or not a specification qualifies.

[http://www.mass.gov/?pageID=itdterminal&L=3&L0=Home&L1=Policies%2c+Standards+%26+Guidance&L2=Drafts+for+Review&sid=Aitd&b=terminalcontent&f=policies\\_standards\\_etrnv4\\_etrnv4dot0intro&csid=Aitd](http://www.mass.gov/?pageID=itdterminal&L=3&L0=Home&L1=Policies%2c+Standards+%26+Guidance&L2=Drafts+for+Review&sid=Aitd&b=terminalcontent&f=policies_standards_etrnv4_etrnv4dot0intro&csid=Aitd)

The only reason OOXML passes the flowchart is because of backward compatibility with older Microsoft Office files. This is also Microsoft's main justification behind approving it. While this reason should not be ignored, it is not a sufficient reason for accepting OOXML. There are at least two reasons why:

1) There is no reason why Microsoft Office can't use ODF. There are several plugins in the works that will allow it to read and write ODF files. Microsoft itself is working with companies on some of these plugins.

[http://www.betanews.com/article/Sun\\_Releases\\_Own\\_ODF\\_Plugin\\_for\\_Office/1183661352](http://www.betanews.com/article/Sun_Releases_Own_ODF_Plugin_for_Office/1183661352)  
<http://sourceforge.net/projects/odf-converter>

Microsoft was a member of OASIS and had ample opportunity to bring the issue up. It chose to remain silent and then subsequently complained and put forward its own format. This is called submarining and should not be tolerated let alone rewarded.

2) If there are features in Microsoft Office that are not supported in ODF, there is nothing preventing Microsoft from joining OASIS and submitting changes. There is already a proven path for exactly this.

An open format should not punish one company or group. Nor should it give an unfair advantage to one company or group. An open format should be a level playing field so that everyone involved, both directly and indirectly, can both compete and have equal access to all the information and resources. With ODF, Microsoft is on equal footing with everyone else. With OOXML, Microsoft has preferential treatment to everyone else. Since Microsoft's Office suite is used heavily throughout governmental agencies, it would be hard to imagine that OOXML will not have preferential treatment. It's a nice self-sustaining lock-in.

Currently, the vast majority of the world's office suite users use some

version of Microsoft Office. It is extremely unlikely that a company legendary for its attitude of "embrace, extend and extinguish" towards standards could be trusted to both keep the format specification 100% open for competitors and put ODF on equal footing with OOXML. Accepting OOXML as an approved open format is just not worth the risk.

What would be the rules for when ODF is used vs OOXML? Would users have to generate and save files in both formats? Would they be allowed to just use the defaults unless specifically requested to save in another? Who decides what the default is?

Once again, I urge the ITD to approve and use only truly open standards that all can use and are non-preferential towards any one company or group, and not approve OOXML, Ecma 376.

Very Sincerely,

Matt Dew

**From:** [CBD1 at aol.com](mailto:CBD1@aol.com)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Open XML  
**Date:** Thursday, July 19, 2007 11:48:09 PM  
**Attachments:**

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I support Open XML.  
Cleve Denny  
Bethesda, MD

---

Get a sneak peek of the all-new [AOL.com](http://AOL.com).

**From:** [Steve Wisniewski](#)  
**To:** [Standards \(ITD\)](#);  
**CC:** ["Diane Marsh"](#);  
**Subject:** RE: Open Standards  
**Date:** Thursday, July 19, 2007 11:14:20 PM  
**Attachments:**

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In working for the US Army as a contractor, I can testify that technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Steve Wisniewski  
US Army  
Ft. Monmouth, NJ  
PdMNetOPs Operations  
Sr. Systems Engineer  
CCNP MCSE 2000 MSTE  
Office: 732-427-1639  
3C306



**From:** [Walker](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:**  
**Date:** Thursday, July 19, 2007 11:00:50 PM  
**Attachments:**

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I recently heard about the new policy the state has regarding the use of different software applications for documents and I think it is a step in the right direction. While I prefer to use Word I also understand that other people and businesses may prefer other applications and I think the government should be open to as many options for its citizens as possible. Every business must give its customers as many options as possible and this policy seems to follow that thinking.

**From:** [Nathan Vegdahl](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Please do NOT adopt Microsoft's OfficeOpen XML specification  
**Date:** Thursday, July 19, 2007 9:21:53 PM  
**Attachments:**

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Hello,

My name is Nathan Vegdahl, and I am a US citizen who cares about keeping public documents accessible and time-durable.

If I have discovered that Massachusetts is considering including Microsoft's OfficeOpen XML specification in the list of acceptable formats with which to store public documents. This disturbs me greatly. The following outlines why.

Firstly, my understanding is that Microsoft's OfficeOpen XML specification is not fully and publicly documented, which prevents its effective use by competitors.

Moreover, Microsoft has a history of using file formats to lock customers into their software products, and I don't think it's wise to allow the use of a file format from a business with such a track record for public documents. People should be able to access such documents regardless of what software they choose to (or can afford to) use, and regardless of accessibility needs.

Microsoft also has yet to document their old office file formats, which likely means that this new format will remain undocumented in the future as well. That means that as the official software that supports it goes out of date, so will the accessibility of the documents themselves. And the accessibility of public documents surely should not go out of date.

With an open, fully documented, and public standard such as the OpenDocument format such scenarios will not happen: even in a worst-case scenario, new code to read the format could always be written again by any capable programmer thanks to the documentation.

I strongly believe that it is imperative that ONLY publicly

documented standards, for which software can be written by anyone (and under any software license), be used for for public documents. Microsoft's OfficeOpen XML specification currently fails to meet those criteria on almost every level, and I believe that adopting it as an acceptable format will undermine both the short-term and long-term accessibility of public documents.

The OpenDocument format is a robust, publicly documented standard that can be freely implemented and used by anyone under any terms. I believe that it is the best choice.

Thank you for your time.

--Nathan Vegdahl

**From:** [Arthur Priver](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Setting file format standards  
**Date:** Thursday, July 19, 2007 7:58:51 PM  
**Attachments:**

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Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Arthur S. Priver  
President  
Mentor Systems, Inc.

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.476 / Virus Database: 269.10.9/907 - Release Date: 7/18/2007 3:30 PM

**From:** [Adam Sferlazzo](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** lrotert at revonet.com  
**Date:** Thursday, July 19, 2007 7:40:56 PM  
**Attachments:**

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Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

**From:** [Scott Bicknell](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Does Ecma 376 qualify as an open standard?  
**Date:** Thursday, July 19, 2007 7:39:22 PM  
**Attachments:**

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What is an open standard?

Bruce Perens provides a valid definition which I quote from Wikipedia [[http://en.wikipedia.org/wiki/Open\\_standard](http://en.wikipedia.org/wiki/Open_standard)]

<quote>

1. Availability: Open Standards are available for all to read and implement.
2. Maximize End-User Choice: Open Standards create a fair, competitive market for implementations of the standard. They do not lock the customer in to a particular vendor or group.
3. No Royalty: Open Standards are free for all to implement, with no royalty or fee. Certification of compliance by the standards organization may involve a fee.
4. No Discrimination: Open Standards and the organizations that administer them do not favor one implementor over another for any reason other than the technical standards compliance of a vendor's implementation. Certification organizations must provide a path for low and zero-cost implementations to be validated, but may also provide enhanced certification services.
5. Extension or Subset: Implementations of Open Standards may be extended, or offered in subset form. However, certification organizations may decline to certify subset implementations, and may place requirements upon extensions (see Predatory Practices).
6. Predatory Practices: Open Standards may employ license terms that protect against subversion of the standard by

embrace-and-extend tactics. The licenses attached to the standard may require the publication of reference information for extensions, and a license for all others to create, distribute, and sell software that is compatible with the extensions. An Open Standard may not otherwise prohibit extensions.

</quote>

So how does Microsoft Office Open XML meet the qualifications of an open standard?

1. Is it available to all to read and implement?

I submit that it is not. Although the more than 6,000 page specification is available, it is not entirely open to implement by anyone other than Microsoft. Important behaviors of the format are described as behaving like earlier versions of Microsoft Office without specifying that behavior. This makes sense given that the MSOOXML specification was not intended to provide a document format for use in products other than Microsoft Office, nor was it intended to define a usable document format for documents headed into the future. Instead, it was intended to provide a means for Microsoft Office 2007 to convert and interpret legacy documents from earlier versions of Microsoft Office.

Contrast this with the aim of the OpenDocument formats, which ARE intended to provide a usable format into the future and that is freely available and usable by anyone.

On this point MSOOXML fails the test for an open standard.

2. Does MSOOXML create a fair, competitive market for implementations of the standard? Or does it lock customers (The Commonwealth of Massachusetts Executive Department) in to a particular vendor (Microsoft)?

This was partially answered above when referring to MSOOXML not being fully specified. If a standard relies on behaviors known only to one vendor, there is no way for competitors to reliably implement the standard in an interoperable way. The only reliable implementation of the standard, then, must be the one from the only vendor with knowledge of its unspecified behavior.

Only Microsoft knows how prior versions of its office software behave, and only Microsoft can reliably implement the Microsoft Office Open XML format.

This does not meet the requirement that an open standard help create a fair, competitive market for implementations of the standard, and use of the format locks customers in to using only Microsoft Office to reliably process documents stored in the format.

3. Does Microsoft covenant with potential implementors of the MSOOXML document specification not to assert patent rights for its implementation?

If you look carefully at what Microsoft has said, you will notice that they do say they will not sue anyone for implementing any part of the MSOOXML format specified by the standard. But what about the parts that are not specified? Those behaviors of the document standard that rely on earlier versions of Microsoft Office that remain unspecified must be implemented somehow if competitors are seriously going to try to produce a usable alternative product. In doing so they open themselves up to possible litigation from Microsoft for patent violations, because these behaviors are not part of the specified standard and thus are not covered by Microsoft's patent pledge.

Contrast this with the covenant from Sun Microsystems which effectively protects anyone from patent liability should they wish to produce a competing product using OpenDocument format.

No one in their right mind would dare try to implement MSOOXML. Not simply because of the daunting task of wading through more than 6,000 pages of inadequate specifications, but because of the fear of litigation.

4. Does ECMA 376 favor one implementation over others?

This question is hard to answer given that there is no complete implementation of the OOXML format in any product and the only partial implementation available is in Microsoft's newest Office product. It is also difficult to judge when Microsoft has not adequately pledged not to enforce its patents against anyone who might wish to create products that use ECMA 376.



However, Microsoft has stated that any implementation must be of the entire format or not at all. This restriction renders OOXML less than open, which brings us to ...

5 & 6. May ECMA 376 be extended, or offered in subset form?

No. This so-called open standard has severe restrictions on how it may be used, as stated above.

Microsoft is pressuring the ISO to legitimize its proprietary formats with the label of "open standard" as a tool to enable them to push these formats and its Office products into governments that require the use of open standards for document formats. The purpose of this is to retain its monopoly position in the office software and operating system markets.

The most important consideration here is whether one vendor's incompletely-specified and proprietary file format is sufficient to secure the documents of the Executive Department of the Commonwealth of Massachusetts. Will these documents be accessible in a hundred year's time if stored in formats that no future generation can implement because of inadequate documentation? Is it reasonable to require the public to purchase one vendor's products in order to gain access to public documents? How will our children's children know our history if the only records available are in a format unreadable by any software in contemporary use? Will Microsoft be around in a hundred years and will they be able, let alone willing, to provide document readers for these formats?

These questions demand carefully considered responses that are free of political pressure.

Please reconsider the inclusion of ECMA 376 as an acceptable format for office documents. Reject it and any other format that is not open to re-implementation by multiple vendors, that is dependent on one vendor's proprietary products and that is encumbered by patent restrictions.

--

Scott

**From:** [Theo Soumilas](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Open XML  
**Date:** Thursday, July 19, 2007 7:08:19 PM  
**Attachments:**

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1-As an international open standard of Ecma International, Open XML meets all state requirements as an open standard. Use of the format will help enable citizens and state agencies to access electronic files well into the future.

Theo Soumilas  
Intelligent Technology Solutions, LLC

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.476 / Virus Database: 269.10.10/908 - Release Date: 7/19/2007 6:10 PM

**From:** [Lee Webster](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Proposed amendment to Enterprise Technical Reference Model (ETRM)  
**Date:** Thursday, July 19, 2007 7:03:16 PM  
**Attachments:**

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To: State IT Division:

I urge you NOT to amend the ETRM to add Microsoft's Office Open XML PROPRIETARY format to the approved list. This would be, in my estimation, a step backwards from the goal of providing accessible public document formats that would be available to future generations.

Sincerely,

Lee Webster, Ph.D.  
Professor of Engineering, CAD, Math & Computers (retired)  
Greenfield Community College  
Greenfield, MA 01301

**From:** [jon hively](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Open XML debate in Massachusetts  
**Date:** Thursday, July 19, 2007 6:00:26 PM  
**Attachments:**

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Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](#) and [openxmldeveloper.org](#), and many independent developers and their customers are benefiting from this new technology.

Thank you for allowing me to comment.

jonathan hively  
the computer man

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<http://newlivehotmail.com>

**From:** [Dan Byerly](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [lrotert at revonet.com;](mailto:lrotert@revonet.com)  
**Subject:** Open XML  
**Date:** Thursday, July 19, 2007 5:17:04 PM  
**Attachments:**

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To whom it may concern:

In my opinion, you should include Open XML in your new policies. With the continued growth and acceptance of Open XML, it would allow citizens and state governments the access to electronic files for many years to come

Dan Byerly  
President  
RCC Technologies, Inc.  
309-693-1985

**From:** [Matthew Raymond](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Thoughts on Office Open XML and the State of Massachusetts  
**Date:** Thursday, July 19, 2007 5:04:50 PM  
**Attachments:** [Thoughts on Office Open XML and the State of Massachusetts.  
odt](#)

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Note: An ODF version of this message created with Microsoft Word and the Sun ODF Plug-In 1.0 is attached.

## THOUGHTS ON OFFICE OPEN XML AND THE STATE OF MASSACHUSETTS

The following are my thoughts on the potential inclusion of Office Open XML (OOXML) as an Enterprise Standard for the state of Massachusetts.

=== De Facto Standards ===

There seems to be some suggestion that OOXML is being considered as an Enterprise Standard by Massachusetts because it is supposedly a de facto standard:

"A de facto standard is a technical or other standard that is so dominant that everybody seems to follow it like an authorized standard. (Wikipedia)"

Source:

[http://www.mass.gov/?pageID=itdterminal&L=3&L0=Home&L1=Policies%2c+Standards+%26+Guidance&L2=Drafts+for+Review&sid=Aitd&b=terminalcontent&f=policies\\_standards\\_etrnv4\\_etrnv4dot0intro&csid=Aitd](http://www.mass.gov/?pageID=itdterminal&L=3&L0=Home&L1=Policies%2c+Standards+%26+Guidance&L2=Drafts+for+Review&sid=Aitd&b=terminalcontent&f=policies_standards_etrnv4_etrnv4dot0intro&csid=Aitd)

De facto standards should only be allowed when the format is sufficiently simple and easy to implement with zero patent concerns. To do otherwise limits the state to working with a small handful of large corporate vendors. Rejection of de facto standards should be seriously considered if such standards deliberately avoid the opportunity to incorporate open standards that are already in use.

### === OOXML is not a De Facto Standard ===

Simple Google searches on file types (using "filetype:[ext]") do not support the idea that OOXML is a de facto standard. Various versions of Microsoft binary formats using the same extensions are far more common. Even if among XML-based formats, OOXML represents a minority of documents on the Internet. Below are the resulting file counts I obtained from my Google searches...

For Word Processing (7-18-2007):

- \* DOC - 48,000,000
- \* ODT - 91,900
- \* DOCX - 923

For Spreadsheets (7-18-2007):

- \* XLS - 16,100,000
- \* ODS - 21,100
- \* XLSX - 180

For Presentations (7-18-2007):

- \* PPT - 17,100,000
- \* ODP - 50,200
- \* PPTX - 724

Because different versions of Microsoft binary formats use the same extensions, it's impossible to say if any specific format is actually a de facto standard at all. There may be no de facto standard.

### === Barriers to Entry ===

It is critical to have as few barriers to entry as possible because it limits competition and thus provides less vendor choice or tax payers and drives up costs. There are numerous ways that support for OOXML represents a barrier to entry for prospective software vendors:

- \* OOXML is not fully specified. (It does not specify how to handle autoSpaceLikeWord95, useWord97LineBreakRules, et cetera.)
- \* It fails to reuse standards (XForms, SVG, ISO 8601, et cetera), which prevents reuse of code already written for these standards.
- \* The size of the specification (6,039 pages) makes it difficult to fully understand and implement correctly.
- \* Implementations may inadvertently not be covered by Microsoft's covenant-not-to-sue. Who is in compliance is essentially left up to

Microsoft because of the language of the covenant.

\* Microsoft may not hold the patents to all materials in the specification because the spec covers legacy support for content created by non-Microsoft software.

\* The specification requires implementation of several proprietary Microsoft technologies, such as VML and Windows Metafiles.

Although numerous examples of programs that read or write to the OOXML format could probably be cited, most of the programs I've seen are highly limited in scope. With few exceptions, these programs only utilize a small portion of the specification and do not even approach the complexity of a complete document editor. Many of them merely output to a limited subset of OOXML. Some of them may not even be totally compliant with the specification. As a result, only a very small number of vendors could even be considered for the State's complete document creation, editing and archiving needs.

=== Format Obsolescence ===

Microsoft has created many XML serializations for various versions of Office, which it has abandoned. This in itself does not bode well for OOXML.

Microsoft's patent to sue does not cover future versions of OOXML at all. Contrast this with Sun's covenant, which automatically includes to any version of ODF in which they have significant participation. I have also been informed that the text of Microsoft's covenant not to sue has changed over time, which is a big no-no for many standards bodies.

=== Competitive Advantage to a Single Vendor ===

OOXML is essentially poorly documented XML serialization of internal Microsoft Office data structures. This means that Microsoft must do little or nothing to support it while competitors, even with the ECMA specification in hand, effectively have to reverse-engineer Microsoft Office (which is a violation of Microsoft's EULA).

Because OOXML is largely just a documentation of Microsoft's own format, Microsoft has little incentive to ensure that their outputted files are completely compatible with the ECMA specification since their enormous development lead will ensure that they are then most compatible for an extended period of time. It is even conceivable that that they may push for future revisions of OOXML to incorporate the flaws in their support and



thus render them fully compliant.

=== Dependence on a narrow selection of implementations ===

Most support of OOXML on other platforms is actually based on the OpenXML/ODF Translator Add-ins for Office project ("ODF-Converter") which was started by Microsoft. Microsoft is also directly involved in the project's development and funding. Note that because the project is under the BSD license, those that redistribute the code are under no obligation to contribute refinements of the software back to the project. Because ODF-Converter translates from OOXML to ODF, the result suffers from the deficiencies of BOTH formats.

=== Questionable validity of ECMA standards from Microsoft ===

The ECMA has a history of rubber-stamping questionable standards based on Microsoft-developed technologies, some of which are only fully supported by Microsoft even after their standardization:

ECMAScript (ECMA-262) - Based on JScript, Microsoft's reverse-engineering of Netscape's Javascript.

C# Language (ECMA-334) - A language developed by Microsoft as a Java killer.

Common Language Infrastructure (ECMA-335) - A central part of MS's .NET Framework.

C++/CLI (ECMA-372) - Microsoft's CLI-based extensions to the C++ language. Many of those involved in the ISO C++ standard criticized that Microsoft tried to push this standard through ISO without going through them first.

Bjarne Stroustrup: "The wealth of new language facilities in C++/CLI compared to ISO Standard C++ tempts programmers to write non-portable code that (often invisibly) become intimately tied to Microsoft Windows."

From the UK position paper: "We consider that C++/CLI is a new language with idioms and usage distinct from C++. Confusion between C++ and C++/CLI is already occurring and is damaging to both vendors and consumers."

The US has this position: "The proposed standard is not market driven, nor is it the product of an industry consensus."

The ISO Fast Track process for ECMA-372 is effectively dead.

XML Paper Specification (TC46) - A standard-in-progress designed to replace the ISO-standardized PDF format. An extension to XPS was proposed to replace JPEG.

Microsoft essentially uses ECMA as an marketing tool against competing technologies, such as Java (with C# and C++/CLI), the Java Virtual Machine (with CLI), Javascript (with ECMAScript, which Javascript was not initially fully compatible with), ODF (with OOXML) and now PDF and JPEG (with XPS).

In at least one case, Microsoft has directly answered comments about OOXML, rather than the ECMA:

<http://www.nooboxml.org/forum/t-13932/why-is-microsoft-answering-comments-of-ecma-standard>

As a result of the above, I believe the ECMA has a serious credibility problem.

=== Supporting OOXML is Unnecessary ===

I don't think it has been properly demonstrated that support for OOXML is necessary. For one thing, software that supports ODF is available from multiple sources free of charge. Also, plug-ins already exist that support ODF in Microsoft Office (such as Sun ODF Plug-In 1.0 for Microsoft Office and the OpenXML/ODF Translator Add-ins for Office). To top it off, Microsoft has recently stated it may be willing to support ODF in it's Office software:

[http://www.betanews.com/article/print/Microsoft\\_Will\\_Support\\_ODF\\_If\\_It\\_Doesn\\_t\\_Restrict\\_Choice\\_Among\\_Formats/1181922127](http://www.betanews.com/article/print/Microsoft_Will_Support_ODF_If_It_Doesn_t_Restrict_Choice_Among_Formats/1181922127)

If such support is added and verified compliant, Massachusetts would be free to choose Microsoft as a vendor while still using the ODF file format. The State could then use it's the vendor independent ODF format to put itself in a better bargaining position with software vendors when negotiating contracts and pricing.

=== Backwards Compatibility ===

Because most previous Microsoft Office files are in binary formats, they must be undergo significant conversion to be make the transition to XML.

During such conversions, legacy formatting can be replaced with more accessible formatting. As a result, much of the legacy support in OOXML is unnecessary.

Sun would have supported OOXML as an ISO standard for legacy content if it weren't for the fact that it doesn't adequately achieve the goal of supporting such content:

"We wish to make it completely clear that we support DIS 29500 becoming an ISO Standard and are in complete agreement with its stated purposes of enabling interoperability among different implementations and providing interoperable access to the legacy of Microsoft Office documents.

"Sun voted No on Approval because it is our expert finding, based on the analysis so far accomplished in V1, that DIS 29500 as presently written is technically incapable of achieving those goals, not because we disagree with the goals or are opposed to an ISO Standard that would enable them."

Source: <http://www.ibiblio.org/bosak/v1mail/200707/2007Jul16-081558.eml>

Although Microsoft claims (recently) to have been ejected from the OASIS process that produced ODF, Pamela Jones of Groklaw states she has sources who contradict this claim. In fact, the European FSF and others have stated that Microsoft has been invited repeatedly to contribute to ODF.

But let's pretend we believe Microsoft for a moment. If OOXML is truly a standard produced by multiple vendors, why would the exclusion of a single vendor from the development of the ODF standard have that much of an impact? Is Microsoft the only company ECMA and OASIS shares in common?!? Furthermore, if Microsoft was really ejected from the ODF standards process, why would they then turn around and back ODF's addition to the American National Standards list?

[http://www.microsoft.com/presspass/press/2007/may07/05-16ANSIVotePR.msp?rss\\_fdn=Press%20Releases](http://www.microsoft.com/presspass/press/2007/may07/05-16ANSIVotePR.msp?rss_fdn=Press%20Releases)

=== Conclusion ===

OOXML is a questionable standard that is inferior to ODF, is not a de facto standard and gives significant advantage to a single vendor: Microsoft. I would advise the State of Massachusetts to reject OOXML as an Enterprise

Standard.

**From:** [Justin Daniel Meyer](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Considering ECMA 376 as open as ODF.  
**Date:** Thursday, July 19, 2007 4:47:46 PM  
**Attachments:**

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Sirs:

It is with much concern I learn that Microsoft's OOXML (ECMA 376) is being considered for inclusion in the acceptable "open standards". From the great amount of material available on the specifics, this is laughable. I know you there are much more involved people on the subject (Andrew Updegrave comes to mind), and I hope you listen to and heed them. There are many reasons to restrict the acceptable "open standards" to ODF (and any others which may actually meet the criteria).

From my experience, MS has only taken existing implementations and added unshared (proprietary) specifics. Java (Sun's lawsuit has details) and HTML (IE only websites?) come to mind. Their history of proper documentation of standards has been on the rapid decline since the early 1980s--just look at the fiasco the EU has had to go through, to get specifics. Microsoft's "standard" weighs in at just over 6000 pages to document everything.

In and of itself, Microsoft (and many other companies) has never done well in maintaining document compatibility and information availability.

MSWorks and pre-Office2003 documents are often not able to be opened in 'current' office suite versions. This is a choice--nothing else--even if for the benefit of letting new capabilities arrive unencumbered by the formats/tags of old. If Microsoft, in creating OOXML, can not let go of such a great many critical format specifications (Word95 issues?, come on!), why can they not ensure complete compatibility?

Through my time in academia for my PhD (ABD) and industry (for fun and money), I have come across a number of applications which use open formats (mostly plain text, naturally), and many which do not. While

getting most of the latter type to talk to each other is almost impossible, it is even worse that if one loses access to the program or upgrades for many versions, access to the raw data/information is lost in 1 of 3 applications. This is unacceptable, but has been getting somewhat better. Applications with open formats are great to work with because it is always easier and the data can not be "managed" away from the user. It is impossible for control of the data/information to be removed from the user/holder. [These are 2 of the 3 main reasons I use open-format and open-source software: ability to remove applications/garbage I do not need/want is the third.] In the case of our government/ state/ judicial documents, I would assert it is of inestimable value to have documents available in perpetuity (essentially) and to those with minimal means. To clarify this last point, ODF is implemented by Free/Open Source Software as well as commercial, and that software runs on free and commercial operating systems; with the free OSs running easily on super-cheap (I have helped people put together computers from those thrown away by others) hardware 2-3 generations old.

ODF is open, readable, realistic, developed by many for the benefit of many, creates equals of all users and those planning to implement it, has no references to vague operations (everything is actually in there, no 'wrappers' covering bits even further inside), has absolutely no fears of being encumbered by any IP, and is already in use by our European (and soon an Asian version of ODF?) brethren. For that is how legislators and those in government must think: as though their constituents are brothers and sisters. MA has a reasonably open government, which ensures involved citizens can not be hoodwinked. I just wish some specific state reps/senators would stop acting like ignorant corporate shills at hearings and let people whom they are supposed to trust do their job and think of the people first. [Maybe their staffs are leading them astray?] Then again, it would be nice if Microsoft representatives were actually held to answering questions asked by state IT reps and legislators. As you can tell, it is obvious to many that some of our legislators are not acting in the best interest of society or government itself.

In the future, I see published laws, bills being considered, court documents and decisions, online forms for completion, minutes of meetings, standards specifications, lyrics, books, emails... everything... in some truly open format. ODF could easily be it: my view may be a little Utopian, but wouldn't it be nice if 30-50 years

from now all documents were in a consistent format? All documents would be readable and searchable by MANY applications, reasonably readable in a text editor because the body and all formatting tags are in plain text, and not dependent on a company's product line for 100%compatible viewing/ manipulating/ printing.

One last thought: a 'standard' which attempts to include everything, especially by not letting go of the arcane, is not a standard. It is appeasement (and limiting). In this case, since Microsoft did not appease any other entity, it seems to be protection. Microsoft has no monetary reason to open up their file formats...only the sensible and altruistic act of government acting for the good of society (one of the main purposes of government, I was taught) can ensure people do not loose their freedoms (a topic for emails to the federal government, it would seem). Companies may either follow or not. For-profit companies will rarely, if ever, lead society towards that freedom.

I kept it down by not going into specifics as several others have (else we would both have dozed off while reading this), but still I must apologize for the length and thank you for indulging me voicing my opinion.

Sincerely yours,  
Justin Daniel Meyer  
Three Rivers, MA

P.S. - Microsoft has made some stink about ODF not implementing proper accessibility options (not quite the right word). In fact, there were few to no accessibility options in the various office applications upto about office 97, if I recall correctly. All accessibility options were 32r-party add-ons! MS should not be calling the kettle black on this issue, it was at least a decade before they got around to working on it themselves. But all of this is moot: ODF is a format not an application. The application contains and implements the computer to human interface, not the format.

**From:** [Paul J. Morris](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [Resor, Pamela \(SEN\); Eldridge, James - Rep. \(HOU\);](#)  
**Subject:** Comments on draft ETRM v40.  
**Date:** Thursday, July 19, 2007 4:42:03 PM  
**Attachments:**

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Dear Sir or Madam,

Attached are some comments on the draft Enterprise Technical Reference Model (ETRM) v4.0 posted at

[http://www.mass.gov/?pageID=itdterminal&L=3&L0=Home&L1=Policies%2c+Standards+%26+Guidance&L2=Drafts+for+Review&sid=Aitd&b=terminalcontent&f=policies\\_standards\\_etrmv4\\_etrmv4dot0intro&csid=Aitd](http://www.mass.gov/?pageID=itdterminal&L=3&L0=Home&L1=Policies%2c+Standards+%26+Guidance&L2=Drafts+for+Review&sid=Aitd&b=terminalcontent&f=policies_standards_etrmv4_etrmv4dot0intro&csid=Aitd)

As a Massachusetts resident I would like to comment on two general areas in the draft: The decision work flow, and the inclusion of ECMA 376 "OOXML", along with a few subsidiary notes.

In previous moves towards information technology standardization in Massachusetts, I was very glad to see Massachusetts taking an appropriate place in global IT leadership by adopting the Open Document format, now ISO/IEC 26300, as a document standard and am very disheartened by the retrograde step of including Microsoft's ECMA 376 in this draft.

1) Concerning the decision workflow:

# Introduces the decision workflow used in recommending enterprise standards; The discussion of decisions in the text of ETRM v40. has some differences from the diagram of the decision work flow. In particular, the diagram enforces a much more rigid decision flow than the text implies. Some specific comments on the criteria in the text:

\* There is existing or growing support around the use of the standard. Support is undefined. If this means multiple implementations from multiple vendors, including open source software then I would concur.

I suggest: "Multiple implementations of the standard, including open source software implementation exist and are in use."

\* The standard interoperates with other relevant Enterprise Standards. Nice sounding but fuzzy word: interoperates. In the context of web



services, it is fine - it doesn't matter what software is running on the ends of a web services connection as long as both support the same interoperable standards. In the context of software generally in the enterprise, in particular in document formats, this is much more problematic, here interoperates implies support in the document format for multiple existing open standards, and for the ability of anyone to write software to extract information from a document in a standard format and write information into that format.

\* The standard can be adopted without causing negative business impact.  
Negative business impact on whom? The commonwealth? Its citizens and taxpayers? Or the Microsoft corporation?

Timescale is important. A short term cost for conversion to an enterprise software infrastructure that supports open standards without ties to any single vendor may have short term costs that will be rapidly offset by the long term savings produced by migration to an environment of open competition and open source software.

I suggest two specific changes:  
"The standard can be adopted without causing long term negative business impact to the commonwealth and its taxpayers."

In allowing de-facto industry standards that are not capable of being implemented by any interested party, the decision workflow loses sight of two critical needs for the IT infrastructure in MA - long term (100 year timescale) accessibility of information, and principles of Open Government with the ability of any citizen of MA to access and interact with the electronic resources of their government.

Limiting negative business impact to very short time scales and the commonwealth, and allowing the use of de-facto industry standards that are implementable by only a single vendor directly violates several of the vision statements that guide ETRM v4.0: # Ease of integration of applications, application services and data to enable inter-agency collaboration and sharing. Can't do without fully documented open standards. # Better responsiveness to changing business needs and rapidly evolving information technologies. The rapidly evolving technologies are open source. # Faster deployment of new applications.

Can't do if you are tied to vendor produced and owned code.  
# Efficient sharing and re-use of current information technology assets.  
Can't do if proprietary software drives  
# Reduce the level of resources and costs required to develop, support and maintain government applications. Total cost of ownership of open source is clearly much lower than proprietary software.

2) # Updates the Information Domain to include additional standards;

I am very concerned by the inclusion in the draft of ECMA 376 "OOXML" "Microsoft Office Open XML" as an additional standard. This is a very bad idea. I strongly oppose it and I strongly recommend removal of ECMA 376 from the ETRM.

I am concerned because: ECMA 376 "OOXML" is not open. ECMA 376 "OOXML" Is not interoperable. ECMA 376 "OOXML" Cannot be freely implemented. ECMA 376 "OOXML" Promotes vendor lock-in. I refer you to the detailed discussion of these issues on:

<http://www.grokdoc.net/index.php/>

[EOOXML\\_Objections\\_Clearinghouse#Ecma\\_376\\_cannot\\_be\\_fully\\_implemented\\_by\\_other\\_vendors](http://www.grokdoc.net/index.php/EOOXML_Objections_Clearinghouse#Ecma_376_cannot_be_fully_implemented_by_other_vendors)

<http://www.groklaw.net/article.php?story=20051129101457378#Contents>

In particular: Future updates or revisions of ECMA 376 are excluded from the OOXML covenant not to sue over patent clause, and will not be implementable in any form by anybody other than Microsoft, any Microsoft patented technologies referred to but not documented in ECMA 376 are not covered by the covenant not to sue, and ECMA 376 references but does not document proprietary Microsoft formats and behaviors in a manner that both requires their implementation and forbids anyone other than Microsoft or a Microsoft licensee from implementing those formats and behaviors (including references to requirements for reverse engineering Microsoft software that was released under an EULA that forbids reverse engineering).

Examining ECMA 376 under the criteria of the draft ETRM v4.0 leaves me baffled as to why it was included, as it fails every single decision point in the flow chart that would lead it to "Recommend as an Enterprise Standard", and is lead directly on the flow chart to "Do not recommend as an enterprise standard at this time" Reviewing the fit of ECMA 376 to the ETRM criteria:

\* The standard interoperates with other relevant Enterprise Standards.

ECMA 376 does not. It is encumbered with patent and licencing issues. It appears to be designed to describe legacy documents rather than interoperate. It has substantial failures in interaction with and support for other standards. See, for some examples, the list of failures to support ISO standards at:

<http://www.grokdoc.net/index.php/>

[EOOXML\\_Objections\\_Clearinghouse#Ecma\\_376\\_contradicts\\_numerous\\_international\\_standards](http://www.grokdoc.net/index.php/EOOXML_Objections_Clearinghouse#Ecma_376_contradicts_numerous_international_standards)

Among the failure to incorporate existing standards is ECMA 376's vector graphics support, where ECMA 376 adopts a failed and rejected attempt by Microsoft to develop a vector graphics standard (VML) instead of simply incorporating the successfull and widely implemented W3C standard SVG, see:

<http://www.robweir.com/blog/2006/07/cum-mortuis-in-lingua-mortua.html>

which notes "Use SVG and you get reuse on three fronts. Stick with VML and the only thing that is reused is Microsoft's legacy code." ECMA 376 repeatedly links to proprietary elements rather than to the existing appropriate, widely implemented, and relevant standards.

Dr G. Nagarjuna Chairman FSF India has made this point very forcefully "The only open standard they have used ... is XML", (<http://wordprocessingml.pbwiki.com/>) "OOXML [ECMA 376] does not use many of the existing standards[.] This is the main reason why the OOXML specification runs to over 6000 pages, and ODF which meets exactly the same goal in about 700 pages. The only open standard they have used (rather abused) is XML. Several published comments on OOXML already make this point sufficiently well, therefore I do not want to repeat them here. Not only that OOXML does not make use of ODF, it also does not make use of MathML, SVG, Xlink, RDF etc."

\* There is existing or growing support around the use of the standard.

On the contrary, there is widespread and growing criticism of ECMA 376 based upon technical details. ECMA 376 seems deeply flawed. To quote

<http://www.grokdoc.net/index.php/>

[EOOXML\\_Objections\\_Clearinghouse#Ecma\\_376\\_contradicts\\_numerous\\_international\\_standards](http://www.grokdoc.net/index.php/EOOXML_Objections_Clearinghouse#Ecma_376_contradicts_numerous_international_standards)

"As far as we can see, all the functionality in Ecma 376 can be represented (better) in ISO 26300, and the much greater length of Ecma 376 is due to its poor design and failure to generalize and use existing standards."

\* The standard can be adopted without causing negative business impact.

By producing vendor lock-in to the convicted monopolist Microsoft corporation, allowing the use of ECMA 376 in ETRM will have substantial negative business impact on the commonwealth, its taxpayers, and all corporations other than Microsoft who wish to do business in or with the commonwealth. These negative business impacts include direct costs of licencing Microsoft software, indirect costs of forced upgrades of hardware, and indirect costs related to managing the vastly increased security risks produced by the use of intrinsically insecure Microsoft software. One example of a specific issue in ECMA 376 that raises enterprise security concerns on its own is are sections 2.15.1.28, 3.3.1.69, and 3.2.29 which define cryptographic hash functions. Cryptography is hard to get right, easy to get wrong, and careful review of any cryptographic algorithm or protocol by the cryptographic community is essential. The cryptographic hash algorithms described in these sections have not had such scrutiny, and their implementation could expose users of software which implements them to substantive security risks. The inclusion of these non-standard hash functions in ECMA 376

was apparently pointless, as there are several national and international standards for hash functions whose properties are well understood by the cryptographic and security communities.

Reviewing the fit of ECMA 376 to the ETRM v4.0 flow chart (which uses language somewhat different from the criteria in the text of the ETRM) it would seem obvious that ECMA 376 should be rejected as an enterprise standard for the commonwealth. At every single decision point, ECMA 376 takes a path to "Do not recommend" (even though it fails and takes this path at the entry point of the flow chart).

Is the standard fully documented and publically available?

Publically available: Yes and no. It is available for examination but appears to be Patent encumbered in a manner that may prevent implementation of software to support it and will prevent implementation of future versions by anyone other than Microsoft.

Fully documented: No. ECMA 376 contains references to undocumented binary blobs (e.g. section 6.2.3.17 "Embedded Object Alternate Image Requests Types" and section 6.4.3.1). The standard reportedly contains non-valid xml. Corporations that are attempting to develop translators for the standard (e.g. Novell) have reportedly been required to sign non-disclosure agreements with Microsoft in order to do so.

ECMA 376: No. Direct path to "Do not recommend".

Is the standard developed by a process that is open, transparent, and collaborative? No. By all reports ECMA 376 was developed in a closed process by the Microsoft corporation and fast tracked to approval with very little community participation. This is evident in the lack of conformity with other standards (e.g. the ISO date standard), and the substantive errors in ECMA 376 (e.g. non-valid xml, mathematical errors in spreadsheet functions). Reports concerning the effort to make ECMA 376 an ISO standard (such as recent reports of the exclusion of Sun and IBM representatives from a meeting of the Portuguese committee examining the proposal) make it clear that the process is not collaborative. Substantive issues exist in ECMA 376 that are indicative of its development by a single vendor without an open development process or regard for existing standards. To give a single example: The discussion of date representation 3.17.4.1 regards all dates prior to 1900 as invalid, and requires implementation of the incorrect treatment of 1900 as a leap year. It shows no regard for the existing standard for numeric representation of dates ISO 8601 and its derivatives RFC 3339 and the W3C note on date and time formats. To quote from Objections to JTC-1 Fast-Track Processing of the Ecma 376 Specification v. 0.1 "There has been insufficient disclosure and too little time to do a comprehensive review."

ECMA 376: No. Not an open standard.

Is the standard developed, approved, and maintained by a standards body.

Developed, No, ECMA 376 appears to have been wholly developed by Microsoft.

Approved and maintained, Yes.

ECMA 376: No. Not an open standard.

Not an open standard -> Is it a de-facto industry standard?

No. Other undocumented Microsoft document formats, such as .doc or .xls or .ppt form a very large base of legacy documents, but "OOXML" is new and has poor penetration. It is widely seen as yet another closed format representative of the past of lock in of customer information into formats supported by only a single vendor, not as a representative of the open future of fully documented formats readily implemented by any vendor.

ECMA 376: No. Direct path to "Do not recommend".

Does the standard interoperate with other relevant Enterprise standards.

No. There are numerous other relevant standards which it does not support, as discussed above. More important than these is ISO/IEC 26300, with which ECMA 376 seeks no interoperability.

ECMA 376: No. Go to Are there compelling business reasons.

Are there compelling business reasons to recommend the standard despite interoperability issues?

No. Quite the opposite, there are compelling direct and indirect cost reasons to reject ECMA 376 as noted above.

ECMA 376: No. Direct path to "Do not recommend".

Can the standard be adopted without causing significant negative business impact?

No. ECMA 376 appears to be implementable solely with software that involves licence payments to Microsoft, and has other compelling direct and indirect cost issues with significant negative business impact to the commonwealth, to taxpayers, and to corporations who wish to do business with the commonwealth, such as having to purchase brand new overpowered hardware to on an upgrade cycle driven by Microsoft with operating system and software licence costs instead of being able to operate on older hardware with open source software under much lower total costs of ownership using any of multiple different vendor implementations of ISO/IEC 26300.

ECMA 376: No. Direct path to "Do not recommend".

3) Some subsidiary notes:

The draft refers to Open Document "OASIS Open Document Format For Office Applications (OpenDocument) v. 1.1", but leaves off mention of its adoption as an ISO standard: ISO/IEC 26300.

A significant component of a service oriented architecture in government is likely to be geospatial information, thus support for open geospatial formats and protocols such as the OGC standards <http://www.opengeospatial.org/standards> would seem appropriate in the ETRM.

Sincerely,  
-Paul

-----  
Paul J. Morris, Ph.D.  
14 Lovers Lane  
Harvard, MA 01451

cc  
Pamela.Resor at state.ma.us  
Rep.JamesEldridge at hou.state.ma.us

**From:** [af castagna](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [lrotert at revonet.com;](mailto:lrotert@revonet.com)  
**Subject:** I fully support the Open XML initiative.  
**Date:** Thursday, July 19, 2007 4:32:17 PM  
**Attachments:**

---

I fully support the Open XML initiative.

1-As an international open standard of Ecma International, Open XML meets all state requirements as an open standard. Use of the format will help enable citizens and state agencies to access electronic files well into the future.

2-There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](http://openxmlcommunity.org) and [openxmldeveloper.org](http://openxmldeveloper.org), and many independent developers and their customers are benefiting from this new technology.

3-Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Antonio castagna, MCSE  
413-281-7229

**From:** [Seth Gordon](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** please do not certify ECMA-376 (Office Open XML) as a Massachusetts "Open Format" standard  
**Date:** Thursday, July 19, 2007 4:17:34 PM  
**Attachments:**

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I write this letter as a resident of Massachusetts who works as a computer programmer for a Massachusetts company (MetaCarta, Inc.). However, my opinions are not necessarily shared by my employer.

The Open Document Format was developed by collaboration among representatives from a variety of companies in an open process. Microsoft could have joined this process--indeed, it still can join this process--but has chosen not to. Instead, they have taken a format developed entirely within their own company and are pushing it as an "open" standard before anyone outside of Microsoft has even tried to fully implement it.

Why have two separate XML standards for the same purpose, representing the contents of office documents, especially when one standard is simply the repackaging of one vendor's proprietary format? If Corel published the specification of WordPerfect Office documents and convinced ECMA to certify it as a standard, would the Commonwealth adopt it as a third "Open Format"?

The only reason I've heard from ECMA-376 defenders is that ECMA-376 can faithfully represent the content of legacy Microsoft Office documents, while ODF cannot. But if there are truly features of Office documents that ODF does not capture, and that are worth including in an open standard, then Microsoft can join the ODF development process, and ensure that the next version of ODF makes those features available to everyone. The Commonwealth should encourage Microsoft to take this route, towards standards that are open in fact and not just buzzwords.

Seth Gordon  
16 Waldo Terr.



Brighton, MA 02135

tel.: 617-661-6382 x519

**From:** [Michael J. Traynor](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [dmarsh at revonet.com;](mailto:dmarsh@revonet.com)  
**Subject:** Benefits of OpenXML  
**Date:** Thursday, July 19, 2007 4:10:28 PM  
**Attachments:**

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**Dear,**

**Please take this concern seriously.... Thanx**

**1-**As an international open standard of Ecma International, Open XML meets all state requirements as an open standard. Use of the format will help enable citizens and state agencies to access electronic files well into the future.

**2-**There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](http://openxmlcommunity.org) and [openxmldeveloper.org](http://openxmldeveloper.org), and many independent developers and their customers are benefiting from this new technology.

**3-**Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.476 / Virus Database: 269.10.8/906 - Release Date: 7/17/2007 6:30 PM

**From:** [Martin Shiu](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [lrotert at revonet.com;](mailto:lrotert@revonet.com)  
**Subject:** Comments on supporting OpenXML  
**Date:** Thursday, July 19, 2007 4:06:58 PM  
**Attachments:**

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To Whom It May Concern:

I would like to submit this email to support Open XML due the following comments.

1-As an international open standard of Ecma International, Open XML meets all state requirements as an open standard. Use of the format will help enable citizens and state agencies to access electronic files well into the future.

2-There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](http://openxmlcommunity.org) and [openxmldeveloper.org](http://openxmldeveloper.org), and many independent developers and their customers are benefiting from this new technology.

3-Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Best regards,

Martin Shiu  
Power Object Inc.  
617 630-5701 ext 201

**From:** [William Dietrich](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Support for Open XML Standard  
**Date:** Thursday, July 19, 2007 3:43:02 PM  
**Attachments:**

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To whom it may concern:

Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](http://openxmlcommunity.org) and [openxmldeveloper.org](http://openxmldeveloper.org), and many independent developers and their customers are benefiting from this new technology

Regards,

William K. Dietrich Jr.  
VP Sales & Marketing  
P.C. Solutions Corp.  
[bill at pcsolcorp.com](mailto:bill@pcsolcorp.com)  
603-666-3733

"Man Succeeds Because He Thinks He Can .....  
Man Fails because He Believes He Will .....

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**From:** [Barry Reiter](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Public Comment on ETRM Draft 4.0  
**Date:** Thursday, July 19, 2007 3:31:13 PM  
**Attachments:**

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Information Technology Division

Commonwealth of Massachusetts

Attention: Beth Ann Pepoli

Re: Public Comment on ETRM Draft 4.0

Dear Ms. Pepoli:

I strongly object to the adoption of the Microsoft-sponsored Ecma 376 (OOXML) proposed standard by any government agency, for the reasons specified below:

1. The main contributor to the problem of document incompatibility – namely Microsoft, through constantly changing it's office document formats in the past in order to force a financially-lucrative upgrade cycle upon it's customers – previously made no effort to produce an open format until it was forced to do so by open-source competition (namely, the approved ISO-standard ODF format). Suddenly reinventing the wheel to the tune of a very complex 6000+ page proposed standard, apparently due to a stubborn refusal to adopt an existing international standard data format (ODF), places an unnecessary and anti-competitive burden on the open-source

consortium currently and very successfully using the ISO standard ODF format. Microsoft certainly has MUCH greater financial resources at its disposal which will allow it to easily adopt the ISO standard ODF format while not suffering irreparable hardship. Forcing open-source companies and organizations to adopt another and very complex document format would place an unnecessary load on the resources of those companies (which do not have the financial resources of Microsoft).

2. Occam's razor states that the best solution to a problem is the most parsimonious; this criteria is used as a basis for decisions in all walks of science, engineering, and social planning. The ODF format is about 600 pages long. The Ecma 376 (OOXML) format is an unnecessarily long 6000 + pages. The ODF is also already developed, in common use world-wide, and is an approved international ISO standard. The OOXML is therefore superfluous, and the use of this format should be discouraged at all costs. There is nothing stopping Microsoft from adopting the ODF format and becoming a contributor to this standard.
3. The point of one international data format is just that; to have ONE format that can be exchanged between businesses, governments, and that can be maintained as a backwards-compatible format as time passes. Having TWO or more document formats defeats this purpose, placing us back in the situation of maintaining and dealing with multiple, incompatible data standards (wasting the resources of all those involved with this process).
4. Microsoft has been previously convicted of monopolistic and anti-competitive business practices; indeed, Microsoft is currently threatening open-source Linux companies (the very companies who use and distribute programs using the ODF format) with lawsuits based on "unspecified" software patent issues. At the same time Microsoft also refuses to acknowledge a legally-binding new software license, GPL3. This paints a picture of a company which certainly can not be relied upon to cooperate with other companies or organizations. The only way this cooperation can be established is through government and international regulations, namely the continued use of one international document format (ODF) which is not controlled by any one company or organization. History shows us that it would be a grave mistake to allow a company with the track record of Microsoft to have primary jurisdiction over any international standard. Microsoft can become a contributor to ODF, and therefore cooperate with other businesses and organizations in a non-destructive manner.
5. Environmental reasons should also weight in this decision. A higher load

or overhead of code generally requires more processing power. As an example of this, please note the requirements for new and much more powerful computers to run Microsoft's current office programs and graphically-intensive operating system (\*Vista\*™). This requires more energy and more landfilling of less powerful computers which are not up to this processing task. This is particularly true if you consider that Microsoft is not only proposing an much larger and much more complex document standard, but essentially is proposing that we have at least TWO open document formats with the inclusion of the existing ODF ISO standard, thereby increasing the complexity of the code required to run on business computers. Occam's Razor again provides us with the solution; stay with a single more streamlined and energy-efficient international standard, ODF, and save our landfills and our atmosphere from millions of tonnes of carbon dioxide and other greenhouse gases related to power generation and the manufacture of computer components. New computers will always be required to replace old or worn-out units, but new machines can be made much more energy-efficient, due to lower processing load.

6. The ODF format is just that, open. Therefore, any and all issues that Microsoft may have with this format can be easily solved by altering their proprietary code in their office programs, and/or by making constructive and cooperative contributions to the ODF codebase.

I therefore urge the rejection of Microsoft's proposed Ecma 376 (OOXML) data format, and the adoption of the current ISO standard ODF format by all businesses, government agencies, and also by personal users who are concerned with the maintenance of fair and open business practices, and with the safeguarding of our environment.

Sincerely,

Barry Reiter



**From:** [Ed Grimm](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** No to EMCA 376  
**Date:** Thursday, July 19, 2007 3:19:17 PM  
**Attachments:**

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EMCA 376 does not appear to be a useful standard - it seems to be missing a lot of information needed to implement it. As such, I do not see it as a viable alternative to ODF.

**From:** [jharter](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [lrotert at revonet.com;](mailto:lrotert@revonet.com)  
**Subject:** Open XML in Massachusetts  
**Date:** Thursday, July 19, 2007 3:18:12 PM  
**Attachments:**

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Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

F James Harter  
UnifiedVoice Corporation

**From:** [jon.richard at omniresources.com](mailto:jon.richard@omniresources.com)  
**To:** [Standards \(ITD\);](#)  
**CC:** [rgonzales at revonet.com;](mailto:rgonzales@revonet.com)  
**Subject:** OpenXML  
**Date:** Thursday, July 19, 2007 3:17:06 PM  
**Attachments:**

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To whom it may concern:

ECMA is doing some great work for open and well supported Standards. OpenXML is just one of the pieces they are doing.

The OpenXML document is similar to a ZIP file that contains XML files. You can test this with any Word 2007 document - the files end with DOCX instead of DOC. Change the DOCX to .ZIP and you can view the contents of the file.

This will allow for easier integration and platform independent processing for a wider range of applications.

Jon Richard

*Account Manager*

**Omni Resources, Inc.**

920.968.0110 x225 (office)

920.277.4958 (mobile)

[jon.richard at omniresources.com](mailto:jon.richard@omniresources.com)

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**From:** [mfitzgerald at ittechstop.com](mailto:mfitzgerald@ittechstop.com)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Open XML debate in Massachusetts  
**Date:** Thursday, July 19, 2007 3:00:09 PM  
**Attachments:**

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Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Thank you,

Michael Fitzgerald  
CEO  
IT TechStop  
<http://www.ittechstop.com>

**From:** [nicholas.bisciotti at jornata.com](mailto:nicholas.bisciotti@jornata.com)  
**To:** [Standards \(ITD\)](#);  
**CC:** [v-lanceb at microsoft.com](mailto:v-lanceb@microsoft.com); [lrotert at revonet.com](mailto:lrotert@revonet.com);  
**Subject:** Open XML standard  
**Date:** Thursday, July 19, 2007 2:36:17 PM  
**Attachments:**

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Massachusetts Standards,

Please accept the Open XML format. There is significant support for Open XML in the marketplace. Open XML allows for easier systems integration. Use of the format will expand the state's ability to develop and work with electronic files.

Thank you,  
Nicholas Bisciotti  
Jornata, LLC  
[nicholas.bisciotti at jornata.com](mailto:nicholas.bisciotti@jornata.com)

-----  
Massachusetts is now seeking public comment before finalizing its updated policy and your voice is important to them. The comment period closes on July 20. The Commonwealth of Massachusetts recently published a proposed new policy that would allow government agencies to use Ecma 376 ? OpenXML file formats. The original policy only included ODF.

**From:** [Tony Vaccaro](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Supporting OpenXML  
**Date:** Thursday, July 19, 2007 2:27:21 PM  
**Attachments:**

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Mr./Ms.

We at American Micro Inc. support OpenXML. Open XML meets all state requirements as an open standard. Use of the format will help enable citizens and state agencies to access electronic files well into the future.

Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Regards,

Anthony Vaccaro  
CEO/Founder American Micro Inc  
Buffalo, NY 14221  
716-861-1412

·  
·

**From:** [Michael Schawan](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:**  
**Date:** Thursday, July 19, 2007 1:42:23 PM  
**Attachments:**

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1-As an international open standard of ECMA International, Open XML meets all state requirements as an open standard. Use of the format will help enable people and state agencies to access electronic files well into the future.

2-There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](#) and [openxmldeveloper.org](#), and many independent developers and their customers are benefiting from this new technology.

3-Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

*Michael Schawan, M.D.  
Schawan Consulting Group, LLC  
CEO & Founder  
(408) 390-7212  
[www.schawanconsulting.com](#)  
[michael\\_md70@comcast.net](#)*

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**From:** [Ward Vandewege](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [campaigns at fsf.org;](#)  
**Subject:** please don't allow Open XML for government documents  
**Date:** Thursday, July 19, 2007 1:22:39 PM  
**Attachments:**

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Dear Madam, dear Sir,

As a Massachusetts resident and taxpayer, I've been very happy with Massachusetts's visionary approach towards future accessibility of government documents. The Massachusetts decision to support the completely standardized and open Open Document Format (ODF) made in 2005 was yet another reason for me to be proud of our state.

Obviously, ODF has the potential to finally break the Microsoft monopoly in the office software market. Microsoft realizes this, and has been attempting to subvert the use of ODF by proposing a competing 'standard' they call Open XML.

The name is misleading - Open XML is not 100% open. There are no guarantees from Microsoft that anyone can implement Open XML without paying royalties on any (Microsoft) patents that might apply to the specification.

The Open XML specification is almost 10 times as long as the ODF specification, and despite that extra length, there are parts of the specified functionality that are entirely undocumented: in several places, the Open XML specification basically says 'insert a binary blob here for this kind of object', without any specification of the format of that binary blob. In other words, the Open XML specification is everything but open - it's riddled with undocumented proprietary sub-sections which will only be implementable by Microsoft, thus furthering the current monopoly.

I understand that Massachusetts is considering to accept Open XML as an alternative to ODF. I strongly urge you *\*not\** to do this; Microsoft is a convicted monopolist, and their past and current behavior leaves no reason to assume that Microsoft's future behavior will be different. Accepting the Open XML specification as an alternative to ODF will effectively allow Microsoft



to kill ODF in Massachusetts. It will cost the taxpayer a lot of money as there will be no alternative suppliers for office software, which means that Microsoft can set arbitrarily high prices. No competition is bad for everyone but Microsoft.

I'd prefer to see my tax dollars used for something that benefits our state directly, rather than increasing the already enormous profits of an out-of-state corporation. Please don't accept Open XML as an alternative to ODF - Open XML is not an open standard.

Sincerely,  
Ward Vandewege,  
Somerville, MA.

**From:** [Deborah Nicholson](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Please support a true open standard for official documents  
**Date:** Thursday, July 19, 2007 1:12:59 PM  
**Attachments:**

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Hi,

Please remove Microsoft's "Office Open XML" format from the list that is being considered for state use. Despite the name, there is nothing "open" about this format.

It is very important for government documents to be accessible to anyone, with any file format, now and in the future. Access to information is one the keystones for a successful democracy. I hope that Massachusetts can set an inspiring example, as we have done with other state-level issues.

I look forward to hearing what is decided on this matter.

Thank you,  
Deborah Nicholson  
808 Parker Street, #1  
Boston, MA 02120

**From:** [Daniel Jared Dominguez](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [campaigns at fsf.org;](#)  
**Subject:** Open standards for government documents  
**Date:** Thursday, July 19, 2007 1:05:10 PM  
**Attachments:**

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It has been brought to my attention that Massachusetts is considering approving Microsoft's Office Open XML Formats (Open XML) as an acceptable "open format." Despite Microsoft's claims, these are neither open nor unencumbered formats and threaten other, more sincere efforts. In fact, there already exists an open document format that is either supported or will be supported by practically everyone else in the industry, and this is obviously a ploy by the Microsoft monopoly to hinder competition.

Please do not add "Open XML" to Massachusetts's list of open formats, as it is not open.

--Jared

--

Daniel Jared Dominguez  
email/jabber/sip: danjared at mit.edu  
pots phone: 617.368.0509  
work email: danjared at laptop.org  
post: 69 Chestnut Street  
Cambridge, MA 02139-4835

**From:** [George LaVenture](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** SUPPORT FOR OPEN XML IN ETRMv4  
**Date:** Thursday, July 19, 2007 12:12:28 PM  
**Attachments:** [070717 ETRMv4 Statement.zip](#)

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18 July 2007

[standards at state.ma.us](http://standards.at.state.ma.us)

Subject: The ETRM v. 4.0

BY EMAIL

Ms. Bethann Pepoli

Acting Chief Information Officer

Information Technology Division

Commonwealth of Massachusetts

Dear Ms. Pepoli:

Thank you for adding Ecma 376 (Open XML) to the list of document formats approved for use by public agencies in Massachusetts via the Information Technology Division's Enterprise Technical Reference Model. I write to add my support during this policy's period of public comment and review. I urge the change be adopted.

I have worked in the technology sector in Massachusetts in both technical and business capacities for over 12 years. During that time I have seen the growth of the Internet from an unknown scientific research and collaboration tool and a

governmental command and control facility to the multibillion dollar global market and forum that it is today. During that period many standards have been proposed, debated, and adopted. Some are with us today, some are not. The bottom line effect, however, is that the choice provided by having multiple standards has allowed the best technology to win in a competitive market.

The Commonwealth of Massachusetts is of course a large user of technology with a wide array of systems to meet diverse needs. While the Commonwealth's end is to serve its citizens, its technology operations should not, in principal, differ substantially from any enterprise in the marketplace.

Like any responsible organization, government agencies should seek the most value, not just the cheapest price, for their dollar. However, the Information Technology Division should not unbalance the marketplace by enforcing procurement biases that prevent some vendors and suppliers from competing.

Also a concern is the unseen impact of limiting choice for government agencies on the business that do business with them. How will limiting their choice impact the technology decisions of their vendors? Is it really the government's right to limit the choices of private sector vendors regarding their in-house technology use? Of course not. Thanks to your efforts that will not come to be.

As a solutions provider that works with governmental agencies I make every effort to provide the most value possible in our efforts. However, no provider, no matter how accomplished, can maximize value for dollar if its hands are tied by restrictive policies that limit the best technology options from being implemented. The ETRM v. 4.0 corrects one major flaw in the policy – and this correction is a step in the right direction.

The reasons for my support are numerous, and I believe that they coincide with the interests of the citizens of Massachusetts and the goals of state government. In brief:

1. Open XML is an open industry standard, approved by Ecma International after standardization by a multi-party committee. The standard can be implemented by anyone.
2. Open XML is a robust standard with support for multiple languages, assistive technologies, financial formulas, and more. Many state agencies will

benefit from the breadth of functionality available under the standard.

3. Together ODF and Open XML garner wide industry support. Without Open XML approval, Microsoft and companies like mine who specialize in Microsoft implementations would have been locked out of government contracting, to the detriment of government employees and citizens.

4. Competitive choice among ODF, Open XML, PDF, and future standards benefits users and innovation. Locking in a single choice in perpetuity runs against the grain of technology's evolution and would be a disservice to government and citizens in the long run.

5. Accepting Open XML in the ETRM will save taxpayer dollars since no clear cost of wholesale state conversion to ODF has ever been provided.

Thank you for your support for Open XML.

Respectfully Submitted,

**George LaVenture**

PRESIDENT & CEO  
MS, MCSE, ASE, API, MCT, CTT

**Trinity Consulting Inc** - Microsoft **Gold** Certified Partner  
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Taking care of business (TCB)

**From:** [Whelan, Kerry \(SEN\)](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:**  
**Date:** Thursday, July 19, 2007 12:07:25 PM  
**Attachments:** [Open.Source.doc](#)

---

<<Open.Source.doc>>

*Kerry Whelan  
Legislative Director  
Office of Senator Frederick E. Berry  
Majority Leader  
State House, Room 333  
Boston, MA 02133  
Phone: 617-722-1410  
Fax: 617-722-1347*



**From:** [Amy Connell](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Re: allow government agencies to use Ecma 376 - OpenXML file formats.  
**Date:** Thursday, July 19, 2007 11:54:01 AM  
**Attachments:**

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To whom it may concern:

There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](#) and [openxmldeveloper.org](#), and many independent developers and their customers are benefiting from this new technology.

Thanks,  
Amy Connell  
Integrated IT Solutions  
781.742.2253

**From:** [dnv](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [lrotert at revonet.com;](mailto:lrotert@revonet.com)  
**Subject:** Open XML  
**Date:** Thursday, July 19, 2007 11:38:40 AM  
**Attachments:**

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I believe that as an international open standard of Ecma International, Open XML meets all state requirements as an open standard. Use of the format will help enable citizens and state agencies to access electronic files well into the future.

Dennis Velozo  
PC-Consulting  
184 Hampden Street  
Indian Orchard, MA 01151  
413 543 6505  
dennis at pc-c.com  
www.pc-c.com

**From:** [Shannon Vanasse](#)  
**To:** [standards at state.ma.us;](#)  
**CC:** [Shannon Vanasse;](#)  
**Subject:** Open XML Debate in Massachusetts  
**Date:** Thursday, July 19, 2007 11:26:10 AM  
**Attachments:**

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To whom it may concern:

As a small computer company on the Cape, we feel that technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Should you require any additional information, please do not hesitate to contact me.

Thank you.

Shannon L. Vanasse  
Computers Without Fear  
a Lighthouse Networks Company  
509 Falmouth Road, Suite 6  
Mashpee, MA 02649  
(508) 477-4767

**From:** [Ben Williams](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** ETRM v. 4.0 comments  
**Date:** Thursday, July 19, 2007 11:11:15 AM  
**Attachments:**

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I am writing to urge the ITD to reverse its recent decision to include Microsoft's Office Open XML (OOXML) file format in its list of acceptable open formats for storing public records. The ITD showed great leadership when announced its decision to use only open formats for state documents. I am concerned that if OOXML is adopted then the goals of the open formats initiative will not be achieved.

I would like to point out that OOXML does not meet the definition of an open format given in the ITD's ETRM v. 4.0 draft. The draft gives this definition:

"The Commonwealth defines open formats as specifications for data file formats that are based on an underlying open standard, developed by an open community, affirmed and maintained by a standards body and are fully documented and publicly available."

OOXML was not developed by an open community, it was developed by Microsoft and has gone through a fast-tracked standardization process with little third-party involvement. While OOXML has been accepted as a standard by Ecma, it recently failed in a committee vote at ISO and its adoption by that organization seems in doubt.

More importantly, I believe that adopting OOXML will endanger the goals of the open format initiative. Microsoft Office is the only full and native implementation of OOXML. Other applications have achieved some level of OOXML support through translators but given the extremely large size of the OOXML specification, 6,039 pages, it seems unlikely that those applications will be able to completely implement the spec. This means that OOXML effectively remains a single-vendor format. When confronted with an OOXML document, state agencies and citizens of the Commonwealth will be forced to purchase Microsoft

software in order to ensure compatibility.

To achieve the goals of protecting end-users from vendor lock in and saving taxpayer dollars through price competition, the Commonwealth must insist on truly open standards. I urge the ITD to refuse to include OOXML on its approved list.

Sincerely,  
Benjamin Williams  
26 Oakview Ter #1  
Jamaica Plain, MA 02130  
benw at plasticboy.com

**From:** [Greg Oros](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Acceptance of Microsoft Office as a standard for document retention.  
**Date:** Thursday, July 19, 2007 11:05:20 AM  
**Attachments:**

---

Dear Sir,

It has come to my attention you are considering accepting the Microsoft Office document as a standard for state documents.

My interest in your decision is that I hope that Massachusetts is an example that we can point to here in Michigan when making a similar decision.

I understand that Microsoft is currently the commonly used office product, and it would be easy to declare their document as a standard. The problem is that the standard as currently written is fuzzily designed, with phrases such as follow Office 97 page break rules. What are the Office 97 page break rules? If that is not clear, and you reference from another document something like page 3 paragraph 2, and when you open the document, how can you be sure that in fact you get the correct page and paragraph? Is there any way to independently verify that the document being re-produced is in fact the document that was stored in Microsoft format?

Microsoft has a pattern of changing interfaces when it suits them for business reasons. A very good example of this is their attempt to modify the Java programming language, so it would only work correctly with their browser on their operating system. Sun microsystems, the owner of Java, was able to stop Microsoft in their attempt. A document saved in their most recent Office format, can not be opened or read by earlier versions of their product. Furthermore while they have a conversion process, to convert documents from earlier versions of their product into the format for their current product, there is no way of knowing how long they will retain this feature, or for how many previous

versions of their product this conversion process will correctly work. Microsoft is concerned with retaining features in their office product that they can change as it suits them. It is difficult to export some of these features to the Open Document Format, and Microsoft refuses to properly support the Open Document Format with their office product. However these features, such as being able to play a video from within an office document, have little to do with proper archiving of documents used in state business.

In years past, there was often concern when a company bought a software package about what would happen, if the company were bought out or went out of business. If the software was no longer available, the company using the software might find itself in a position where it could no longer continue to operate. In such cases, some of the contracts specified that the source code for the software be put in escrow. The Microsoft office product is very large, and I believe even if the source code were put in escrow, it would be very difficult to assemble a working product so that documents saved in their proprietary format could be accessed.

I realize that when a company is as large as Microsoft, there is little fear that it will go out of business. However in terms of businesses, Microsoft is a very young company, with only two Chief Executive Officers to date. Chrysler, is very much older, had to be bailed out with a government loan, and was finally sold to a German company. Likewise Pan American Airways, was a very well established, world leading airline, and they went out of business.

I hope that Massachusetts will decide to limit documents to the Open Document Format, which is fully specified and documented in an open standard that can be implemented without constraint. Further using the Open Document Format standard it is possible to determine whether the software used to implement the standard does in fact implement the standard, and the user of the standard can trust the documents stored in that format can be accurately reproduced. In addition, there is a product currently available, OpenOffice.org that produces documents in accordance with the Open Document Format, that will work properly on not only the Microsoft Windows operating system, but will also work correctly on the Macintosh computer, and on computers running various versions of the Linux operating system. I would like to point out that for a period of time Microsoft refused to provide a version of it's Office product to users of Apple computers, and to date has refused to

provide a version of it's Office product that will run on computers using the Linux operating system. It is Microsoft's prerogative to refuse to support their product on any operating system they desire. In fact it is even their prerogative to cease supporting their current office product entirely. They might decide that they can not compete with a web based product, and as a business it is no longer in their interest to support it.

I hope you will take the above in consideration as you make your decision.

Respectfully,

Greg Oros

1190 Paula Street  
Martin, Michigan 49070



**From:** [cara\\_williams at att.net](mailto:cara_williams@att.net)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** response concerning Open XML format  
**Date:** Thursday, July 19, 2007 10:52:20 AM  
**Attachments:**

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Hello,

I am writing in support for allowing Open XML file format.

This is important in my work - because of Open XML format being an international open standard - Ecma standard.

I am interested in usability and accessibility concerns and in future . The Open XML format will improve both of these areas.

I have recently started working in the accessibility area and was surprised at how many software organizations have been watching the upcoming MA decision on file formats.

I think using Open XML will push for more innovation and larger choices for a developer.

Please support Open XML.

Thanks for your time,  
Cara Williams  
104 Woodcrest Dr  
Melrose, MA 02176

I will

**From:** [Bob Blau](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Open formats  
**Date:** Thursday, July 19, 2007 10:36:37 AM  
**Attachments:**

---

Dear ITD members,

I'm a long time resident of Massachusetts, having come to the Commonwealth to attend MIT, and getting my degree in Computer Science in 1976. I now live in Boxborough.

I applaud your efforts to specify open standards to ensure that documents created and stored by the government will be accessible in 10, 50, 100 years. However, I see that you now include ECMA-376 (MSOOXML) as an acceptable open format. I view this simple inclusion as enough to entirely defeat the goals of your architectural framework.

Note that I have always used Microsoft products on my home computers. I have never owned a Mac and don't run Linux on any of my many computers. It is because of this that I understand that Microsoft has a business model of obsoleting their old software every few years. They try very hard to ensure that it is only possible to upgrade through the purchase of new versions of their operating system and office productivity software, since this is how they make their living. They accomplish this by making sure that all of my documents and presentations are in a format which only their software can fully interpret, eliminating any potential competition for reasons of compatibility rather than through price, features, and quality.

ODF and truly open standards threaten their ability to lock out competition. Microsoft has a long history of trying to sabotage new technologies (such as the Java programming language and the Netscape Internet Browser) which threaten their monopoly on PC software.

ECMA-376 is another example of this, and by including it in your framework you ensure that Massachusetts will be tied to Microsoft's

expensive upgrade cycles for years to come, at great expense to taxpayers like me. Only Microsoft will be able to fully implement ECMA-376, so it defeats the whole purpose of specifying open standards.

Please enforce the ability for Massachusetts to buy it's productivity software from the most qualified vendors in the future by eliminating ECMA-376 from your acceptable formats.

Thank you,  
Robert Blau  
480 Robinson Rd.  
Boxborough, MA  
01719

**From:** [Andy Jackson](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Public Comment Ecma 376 -  
OpenXML  
**Date:** Thursday, July 19, 2007 10:18:40 AM  
**Attachments:**

---

There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](#) and [openxmldeveloper.org](#), and many independent developers and their customers are benefiting from this new technology.

**From:** [Dave Graham](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Open XML Support  
**Date:** Thursday, July 19, 2007 10:13:48 AM  
**Attachments:** [Lola Rotert.vcf](#)

---

There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](#) and [openxmldeveloper.org](#), and many independent developers and their customers are benefiting from this new technology.

I and my company are in support of this technology.

Dave Graham  
Flickerdown Data Systems  
Flickerdown Digital Content Creation  
1207 Main St. #2  
Holden, MA. 01520

**From:** [KWTm](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Vote against Microsoft OOXML  
**Date:** Thursday, July 19, 2007 10:11:00 AM  
**Attachments:**

---

Please do not make us use Microsoft OOXML. It is a poorly designed standard.  
Please use ODF instead.

--

KWTm

"Ni parolu per Esperanto!"

<http://slashdot.org/~KWTm/>

This message sent on Ubuntu Linux with OpenPGP!

**From:** [ngiovelli at gnsdata.net](mailto:ngiovelli@gnsdata.net)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Open XML debate in Massachusetts  
**Date:** Thursday, July 19, 2007 10:09:23 AM  
**Attachments:**

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As an international open standard of Ecma International, Open XML meets all state requirements as an open standard. Use of the format will help enable citizens and state agencies to access electronic files well into the future.

*Nicholas Giovelli*

**GNS Communications LLC**  
407.756.2468

**From:** [Joe Bellil](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Public comment on ETRM v. 4.0  
**Date:** Thursday, July 19, 2007 9:33:32 AM  
**Attachments:**

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Easter Seals Massachusetts is submitting the following comment in support of Open XML:

We support software that is accessible to all people with disabilities. Our understanding is that Open XML meets all state requirements as an open standard and is an accessible format that can be used by assistive technologies. We also appreciate the significant support for Open XML in the marketplace today.

Please feel free to contact me if I can be of assistance.

Thank you,  
joe

Joe Bellil  
Vice President of Public Affairs  
E-mail: [JBellil at EasterSealsMA.org](mailto:JBellil@EasterSealsMA.org)

484 Main Street  
Worcester, MA 01608  
508-751-6340 Fax: 508-831-9768

89 South Street  
Boston, MA 02111  
617-226-2852 Fax: 617-737-9875

TTY: 1-800-564-9700  
Toll Free: 1-800-244-2756 x340  
Web Page: [www.EasterSealsMA.org](http://www.EasterSealsMA.org)

**Mission:** Easter Seals provides services to ensure that children and adults with disabilities have equal opportunities to live, learn, work and play.

**Vision:** That all people with disabilities are empowered to reach their full potential.



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**From:** [Gordon Housworth](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Comment of Open XML adoption  
**Date:** Thursday, July 19, 2007 9:22:48 AM  
**Attachments:**

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We are writing in support of adding OpenXML to your proposed document formats. We find the standard useful in our applications development and, having watched far too many data formats 'slip away' in the past thereby rendering archival data unavailable - or only recoverable at significant cost and interruption - we believe that XML adds to document longevity.

Regards, Gordon Housworth  
Intellectual Capital Group LLC  
phone: +1 248.626.1310  
<http://www.icgpartners.com>

From: [Francesco Fiore](#)  
To: [Standards \(ITD\);](#)  
CC:  
Subject: Mass ITD Standards  
Date: Thursday, July 19, 2007 8:21:02 AM  
Attachments:

---

Mass ITD,

I am writing to express an opinion that your organization should support approval to use Office Open XML for use in creating and storing all government documents in Massachusetts.

As an international open standard of Ecma International, Open XML meets all state requirements as an open standard and therefore should be approved for use by government agencies. Use of the format will help enable citizens and state agencies to access electronic files well into the future. There is significant support for Open XML from all over the world as shown by the support on [www.openxmlcommunity.org](http://www.openxmlcommunity.org). They keys that these people highlight are interoperability (which in my opinion is always the most important) and standardization. This is a leading worldwide technology standard and I know that you agree that Massachusetts should strive for world-class in everything it does. From government health programs to IT solutions.

Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation, which should be the ultimate goal of all democratic, market-driven societies.

Thanks for your consideration,  
Francesco Fiore  
Hopkinton, MA

---

Local listings, incredible imagery, and driving directions - all in one place! [Find it!](#)

**From:** [David Fletcher](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Office documents standards  
**Date:** Thursday, July 19, 2007 7:59:44 AM  
**Attachments:**

---

I have heard that you are open to points of view regarding standards in office software file formats.

My point of view is that the only sensible course of action is to have one standard. We have single standards for example, for physical units such as the metre, the kilogramme and the second. Anything else would be plain stupid because of the confusion it would cause.

The same applies to the formats used for the storage of documents. Anybody who needs to read and/or modify a document should be able to have a single application which will work with all documents from all public archives.

In my opinion the standard to be used must be ISO 26300, because that is the agreed and approved standard for document storage, available for use in any application written in the future in addition to Open Office.

I find it incomprehensible that Ecma 376 is being considered for use by anybody, and is even being discussed by ISO. Unlike ISO 26300, Ecma 376 does not exist for the good of mankind. Its only purpose is the continuation of the payment of license fees to a single entity, and I urge you to reject its use.

Regards,

David Fletcher

**From:** [Clark, Hal](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ETRM specification  
**Date:** Thursday, July 19, 2007 7:37:51 AM  
**Attachments:**

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Good morning,

I just read about the pressures to accept Microsoft Office Open XML into the ETRM standard. You should not do this since acceptance would support Microsoft's approach to domination by embracing standards and then modifying them to become proprietary.

There is nothing wrong with XML, so why is Microsoft making their own version?

Thank You  
Hal Clark

**From:** [Kurt Bischoff](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Word and Excel do not conform to OOXML  
**Date:** Thursday, July 19, 2007 7:31:21 AM  
**Attachments:**

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[http://www.bloomberg.com/apps/news?  
pid=20601085&sid=aR9bHOp5bm3A&refer=europe](http://www.bloomberg.com/apps/news?pid=20601085&sid=aR9bHOp5bm3A&refer=europe)

> Microsoft Faces EU Probe on Word, Excel Dominance, People Say

>

> By Matthew Newman

>

> The European Commission in Brussels has sent a second questionnaire to  
> rivals of Microsoft asking them for additional details on how the  
> company may crimp competition by withholding technical data on Word  
> and Excel, said the people, who declined to be identified because the  
> letters aren't public.

>

> "The commission will have to look at whether Microsoft was  
> deliberately holding up that information," Neil Macehiter, a partner  
> at Cambridge, England-based technology consulting firm Macehiter  
> Ward-Dutton, said in an interview.

>

**From:** [Kurt Bischoff](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** OOXML v. ODF  
**Date:** Thursday, July 19, 2007 7:21:16 AM  
**Attachments:**

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<http://www.idm.net.au/story.asp?id=8617>

> Japanese Government Embraces Open Source  
>  
> By Greg McNevin  
>  
> July 17, 2007: Japan has become the latest country to have its  
> government openly embrace the OpenDocument format, making a shift to a  
> new policy structure that favours open source solutions over proprietary.  
>

**From:** [Charles-H. Schulz](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Ars Aperta"s comments on Ecma 376  
**Date:** Thursday, July 19, 2007 6:38:22 AM  
**Attachments:**

---

Hello,

this mail shall provide our comments about the possible adoption by the Commonwealth of Massachusetts of the Ecma 376 format as the default format for office documents.

Ars Aperta (<http://arsaperta.com/en/index.html>) does not support the adoption of the Ecma 376 format, otherwise known as Microsoft Office OpenXML, by the Commonwealth of Massachusetts information infrastructure.

- Ars Aperta thinks that Ecma 376 does not meet the needs of both Massachusetts's administration and citizens. Despite having a large part of this format's specification published, there seems to be some legal uncertainties about the rights covering the free use and modification of this format, especially because the protection and promises made by the author of the specification remains unclear on the topic of implementations conformant to this format.

- Ars Aperta thinks that the claims made by the Ecma 376 author asserting that this format has the ability to faithfully represent the informations and their layout contained in millions of Microsoft Office binary file formats is technically uncertain. This claim cannot be verified by analyzing the current Ecma 376 specification. The solution Ars Aperta recommends is the complete opening of the Microsoft Office binary file formats, allowing third-parties to compete on this market by developing applications allowing complete or partial compatibility with these documents' stacks.

- While the author of Ecma 376 claims that it has the ability to interact with these binary file formats, there is not a single line in the entire Ecma 376 specification that allows a third party



implementation to access these binary formats other than by using calls and tags inside the Ecma 376 specification. This provides only for a very limited access and features set, and this does also obfuscate the ability for any third party implementation to fully use the features of the Microsoft Office binary file formats.

-Ars Aperta believes that this situation only reinforces one particular vendor and offers her a dominant position on this market, stopping the whole software industry to compete freely on the basic, yet essential layer of the office document formats.

- According to the claims of the author of Ecma 376, this format favors extensibility over steady and concerted evolution and customization over interoperability. Ars Aperta was however under the impression that the Commonwealth of Massachusetts was looking for a truly interoperable file format for office documents.

- Ars Aperta respectfully points out to the Commonwealth of Massachusetts that the existing ISO standard ISO/IEC 26300, otherwise known as OpenDocument Format for Office Applications (ODF) seems to be a better candidate than Ecma 376. ODF already is an ISO standard and has gained wide industry support. It reuses known ISO and W3C standards, and offers all the benefits of openness while allowing its users vendor's lock-in and technological independence.

-Contrary to Ecma 376, ODF would allow the citizens and businesses of Massachusetts to have multiple choices of solutions using ODF while ensuring their documents sustainability and perennity for up to 30 years.

-Last but not least, Ars Aperta believes that Ecma 376 and ODF strongly overlap each other and that there should not be two standards for the same use. ODF is to this day the only ISO standard while questions arise and lack of consensus is tarnishing the standardization process of Ecma 376.

Ars Aperta respectfully asks the Commonwealth of Massachusetts to reconsider the choice of Ecma 376 in favor of OpenDocument Format for Office Applications (ODF), an ISO standard offering true interoperability, steadiness, openness, and community input and inclusiveness.

On behalf of Ars Aperta,

--

Charles-H. Schulz,  
Associé / Associate  
Ars Aperta.

**From:** [William Pardee](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ETRM 4.0; Open XML proposal  
**Date:** Thursday, July 19, 2007 6:12:02 AM  
**Attachments:**

---

[standards at state.ma.us](http://standards.at.state.ma.us)

Revised ETRM; Open XML

To whom it may concern:

I am writing in reference to the proposed ETRM version 4.0, in particular the proposal to designate ECMA-376 Office Open XML Formats (Open XML) technical specification as an alternative to Open Document Format (ODF) for document exchange and archiving. For your information, I am a Commonwealth employee and an attorney. I have no real technical knowledge, but considerable interest in these issues. I have followed the movement toward open document formats with particular interest, since I have a great deal of experience as one who has done my own document preparation for upwards of 20 years, and as a designated custodian of public records.

In my opinion, ECMA-376 is entirely superfluous going forward as a format for either purpose. Propagating a second format (I would not count Portable Document Format, which serves distinct functions) at best will increase confusion and overhead costs due to the need to support two formats. At worst, Open XML may prove to be a Trojan horse that, once accepted into the ETRM, will defeat the goal of an open, freely usable and widely adopted standard.

First: Open XML is superfluous. The principal, perhaps sole selling point for Open XML is its purported compatibility with the "billions" of legacy documents. But in reality Open XML is not compatible with all legacy documents, only (at best) those produced using a version of Microsoft Word. (I myself have used WordPerfect for 20 years, and I can assure you that Microsoft Word does not support my legacy document formats.) Thus, if ITD accepts this argument for a second standard, it must logically entertain a variant "open" format for every word processor now or formerly on the market, so long as the proponent of the standard gets an ECMA seal of approval.

In reality, all "legacy" documents will have to be translated into a new open format for preservation and future access. The very introduction of Open XML itself proves that even Microsoft Word-created legacy documents will have to be translated to a new format. Thus, Open XML does not offer to save labor as

against translating legacy documents into PDF (if complete fidelity of appearance is desired) or ODF (if for editing or reusing) formats.

Indeed, looked at in this way, it is apparent that the major selling point of Open XML is an integrated translation function that could just as easily be separated from the open format itself, thereby making the format a good deal more streamlined (and probably easier for competitors to implement). For example, Open Office is capable of reading Word-created legacy documents and translating them into ODF. Would ITD accept the combined function as offered in Open Office (a truly open format since the source code is also open) as yet another variant, on a par with ECMA-376? This, I think, shows that the principal selling point for Open XML is actually a vestige of prior closed standards, not a true feature of an open standard.

Second: Acceptance of Open XML will increase overhead costs and confusion, and decrease efficiency. This point seems self-evident. Allowing additional open document formats essentially exchanges Babel for "open" Babel. Perhaps the open-ness of the formats will reduce software costs as compared to the present situation, but having several incompatible open formats to serve the same purpose will either require software developers to incur the expense of supporting both (or many, if the logic of this proposal is pursued) formats, or will force agencies and the public to purchase multiple software packages to ensure that public documents are indeed accessible. This seems a betrayal of the purposes identified in ETRM 3.6. In particular, it hardly serves the goal of open government to proliferate formats needlessly. One can hide documents in the open, and this proposal makes it easier to conceal public documents by artful manipulation of formats -- particularly if other vendors avail themselves of this precedent.

Third: Open XML may prove to be a Trojan horse. While I appreciate ITD's effort to maintain neutrality with respect to open formats, Open XML falls short of a true open standard, when measured by the criteria expounded in ETRM 3.6. I submit that unless and until Open XML fully satisfies those criteria, it would be extremely foolish to accept this standard at face value.

Here is how ITD has defined open standards:

"Specifications for systems that are publicly available and are developed by an open community and affirmed by a standards body. . . . Open standards imply that multiple vendors can compete directly based on the features and performance of their products. It also implies that the existing information technology solution is portable and that it can be removed and replaced with that of another vendor with minimal effort and without major interruption"

Open XML was certainly not developed by an open community, and the very lack of transparency with respect to its development is cause for concern regarding the future. It has been approved as a standard by ECMA, but one can hardly call it an "open" standard in the true sense, since ECMA (by all accounts I have seen) accepted the standard as

specified by Microsoft (including many elements, particularly relating to legacy formats, that do not actually specify); does not require that the standard be made available without fees or royalties for use by competitors; and recognizes Microsoft's right to extend the standard in the future with proprietary extensions. In this regard, it is significant that the national body responsible for reviewing proposed ISO standards recently declined to approve ECMA-376 (the process is ongoing).

Furthermore, it remains to be shown that Open XML is a standard that will allow "multiple vendors [to] compete directly based on the features and performance of their products." According to various accounts, it is an ungainly standard, with many elements that do not allow for replication by Microsoft's competitors, particularly those having to do with formatting of legacy Word documents. To the extent that these elements are part of the standard, they could still be employed by Microsoft to cripple competitors' ability to read, edit and save new documents created in Word. And Microsoft remains free to "extend" its standard in ways that impede document exchange between competing programs. As things stand, it seems evident that once this "standard" is accepted, it will be "enhanced" in ways that will prevent replacement of incumbent software "with minimal effort and without major interruption." In any event, there is no implementation of Open XML on the market, except for that (reportedly nonconforming) in the most recent version of Word.

In light of the closed process followed in developing this standard, and of ECMA's extremely permissive rules for recognizing a standard, ITD should at the least hold off recognizing Open XML until the standard has been recognized by ISO, and has been implemented by at least one developer other than and independent of Microsoft.

Preferably, ITD should not accept Open XML as an alternative open document standard, for reasons previously stated.

Yours truly,

William L. Pardee  
[wpardee at attglobal.net](mailto:wpardee@attglobal.net)

**From:** [Beth Sawyer](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** open XML  
**Date:** Thursday, July 19, 2007 6:11:01 AM  
**Attachments:**

---

I received your email

We don't see any reason not to make open xml a standard - so I guess you can count us in

Beth

Beth Sawyer  
President of Sales  
OSCaM Technical

15125 Elk Run Rd  
Chantilly, VA 20151  
Phone: 703-880-6457  
Toll Free: 888-663-7038  
Fax: 703-880-6500

[www.oscam.net](http://www.oscam.net)

\*\*\*\*\*

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[www.oscamtechnical.com](http://www.oscamtechnical.com)

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**From:** [Gunner](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Public Comment on Enterprise Technical Reference Model  
**Date:** Thursday, July 19, 2007 2:29:59 AM  
**Attachments:**

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As documents and services are increasingly transformed from paper to electronic form, there is a growing problem that governments and their constituents may not be able to access, retrieve and use critical records, information and documents in the future. To enable the public sector to have greater control over and direct management of their own records, information and documents, the ODF is the right way to go.

I urge the Commonwealth to oppose the addition of Ecma-376 - Office Open XML Formats (OOXML) because it would be a harmful step backwards for the Commonwealth for the following reasons:

- The Commonwealth should encourage interoperability - Adoption of Ecma-376 / OOXML would be a shift away from interoperability offered by ODF because OOXML is a single vendor format that is not interoperable with other formats and applications.
- The Commonwealth should encourage choice - Adoption of Ecma-376 / OOXML would eliminate choice because as a single vendor format, it does NOT provide choice of applications support, like ODF.
- The Commonwealth should encourage harmonization - Adoption of Ecma-376 / OOXML would discourage harmonization by creating a disincentive for Microsoft to harmonize with existing open standards such as ODF and with other -- non-Microsoft -- applications.

Thanks.

Gunner Carstens



Jarlsmindevej 246  
8260 Viby J  
Denmark

**From:** [Jeffrey L. Caruso](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Microsoft Office Open XML format  
**Date:** Wednesday, July 18, 2007 11:48:25 PM  
**Attachments:**

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I oppose the approval of Microsoft's Office Open XML (OOXML) format as an open standard.

It is neither fully documented nor interoperable with other already-approved open standards, and is certainly not "open". From the beginnings of Microsoft Office, Microsoft has spent great effort in making its documents unreadable by any software other than their own. This is no time to let the data of Massachusetts be held hostage by such a company.

Regards,  
- Jeffrey Caruso

--

\*\*\*\*\*

Dr. Jeffrey L. Caruso  
Rocket Scientist  
Bitstream, Inc.  
245 First Street  
Cambridge, MA 02142  
(617) 520-8366

**From:** [Stuart McKee](#)  
**To:** [standards@state.ma.us](mailto:standards@state.ma.us);  
**CC:** [Dave Reilly](#);  
**Subject:** Microsoft comments on ETRM v 4.0  
**Date:** Wednesday, July 18, 2007 11:42:33 PM  
**Attachments:** [Microsoft ETRM4 response final 7 18.pdf](#)

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July 18, 2007

BYELECTRONICMAIL to [standards@state.ma.us](mailto:standards@state.ma.us)

Ms. Bethann Pepoli  
Acting Chief Information Officer  
Information Technology Division

Dear Ms. Pepoli:

Microsoft respectfully requests you consider the following comments related to the proposed update of the Enterprise Technical Reference Model v 4.0 ("ETRM") posted July 2, 2007.

Microsoft strongly supports the mission and efforts of the Information Technology Division (ITD) of the Executive Office for Administration and Finance (ANF) to further the use of technology in meeting the needs of citizens of the Commonwealth of Massachusetts. Furthermore, we strongly support the role of the many Chief Information Officers and technology managers in providing strategic direction and guidance to the Governor's office and Commonwealth government operations.

We would like to express our support for the inclusion of Ecma-376 Office Open XML File Formats ("Open XML") as a recommended Enterprise Standard and a choice for agencies. We believe it is important to provide agencies with a broad set of tools to address unique requirements and diverse stakeholder groups, and to enable them to choose the open file format that best serves

their needs.

The ETRM clearly lays out the requirements for an Enterprise Standard and Open XML satisfies all the stated criteria. Open XML was overwhelmingly approved as an international standard by the ETRM reference standards organization Ecma International, in December 2006. The Ecma Technical Committee (“TC”) that developed Open XML consisted of information technology companies (Apple Computer Inc., Intel Corporation, Novell, Inc., NextPage, Inc., Toshiba Corporation and Microsoft Corporation), government institutions that archive documents (The British Library and the United States Library of Congress), and sophisticated power users of information technology (BP PLC, Statoil ASA, Barclays Capital and Essilor). The Microsoft contribution to the TC was approximately 2000 pages and the final Open XML specification developed by the TC is over 6000 pages, comprehensively detailing the specification. The specification is publically available without charge (<http://www.ecma-international.org/publications/standards/Ecma-376.htm>).

Additionally, Microsoft has made its necessary patent claims in Open XML available royalty-free under our Open Specification Promise (“OSP”) to enable others to implement Open XML (see <http://www.microsoft.com/interop/osp/default.mspx>). The OSP has been received favorably by many legal experts, including members of the open source community such as Mark Webbink, Deputy General Counsel for Red Hat, Inc. and Lawrence Rosen.

Moreover, there is strong and growing support for Open XML in the IT industry (see <http://www.openxmlcommunity.org/> and <http://www.openxmldeveloper.org/>). For example, Xandros, Inc. ([http://www.xandros.com/news/press\\_releases/open\\_xml.html](http://www.xandros.com/news/press_releases/open_xml.html)) and Linspire, Inc. ([http://www.linspire.com/lindows\\_news\\_pressreleases.php](http://www.linspire.com/lindows_news_pressreleases.php)) recently announced support for Open XML in their products, and Apple’s iPhone also supports Open XML in the .docx and .xlsx file formats ([http://manuals.info.apple.com/en/iPhone\\_User\\_Guide.pdf](http://manuals.info.apple.com/en/iPhone_User_Guide.pdf)). Additionally, both Denmark and Switzerland have recently acknowledged Open XML as an open standard (see <http://blogs.msdn.com/jasonmatusow/archive/2007/06/25/denmark-says-odf-and-open-xml-ok.aspx> and [http://www.ech.ch/index.php?option=com\\_docman&task=cat\\_view&gid=92&lang=en](http://www.ech.ch/index.php?option=com_docman&task=cat_view&gid=92&lang=en)). Finally, in addition to the SUN translator referred to in the ETRM, another translator project hosted at <http://sourceforge.net/projects/odf-converter> is developing open source translators between Open XML and ODF and is

continuing to expand, with recent additions being Xandros, Linspire and TurboLinux (<http://www.turbolinux.com/cgi-bin/newsrelease/index.cgi?date2=20070610165432&mode=syosai>). Moreover, the German national standards body DIN is creating a technical report to define how to do translations between ODF and Open XML ([http://www.fokus.fraunhofer.de/fokus/fokus/presse/meldungen\\_fokus/2007/05/DIN-E.pdf](http://www.fokus.fraunhofer.de/fokus/fokus/presse/meldungen_fokus/2007/05/DIN-E.pdf)). The growing interest in and use of translators to translate between Open XML and ODF evidences that translators are accepted in the industry as an effective way of achieving interoperability between these formats.

Thank you for the opportunity to comment and your consideration. We look forward to continuing to work together to meet and exceed the expectations of the Commonwealth.

Regards,

/s/

Stuart McKee  
National Technology Officer  
US Public Sector

**From:** [Peter Olson](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [campaigns at fsf.org;](#)  
**Subject:** please do not allow Microsoft OOXML as an acceptable document format  
**Date:** Wednesday, July 18, 2007 10:23:58 PM  
**Attachments:**

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I am writing about recent news that the Commonwealth of Massachusetts is considering Microsoft's OOXML as an acceptable standard for documents produced by the government.

I think this is a mistake because OOXML is not a genuine effort by Microsoft to open their document formats; it is an attempt to defeat the acceptance of ODF, a competing standard which is non-proprietary and free for all vendors and users of computers to implement and inter-operate with.

Several years ago, the Commonwealth of Massachusetts was a leader in the effort to ensure that documents created today will remain usable forever. This was a refreshing alternative to myriad of proprietary formats with their ever-increasing hazard of becoming unsupported and hence unusable.

We print documents on acid-free paper to ensure that they don't deteriorate due to age; let's be sure that electronic documents are afforded the same degree of care.

Peter Olson  
Watertown, MA

**From:** [Stephen Brown](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** ["Robert Gonzales"; GLaVenture at Trinity-Inc. net;](#)  
**Subject:** The ETRM v. 4.0 - OpenXML  
**Date:** Wednesday, July 18, 2007 10:17:28 PM  
**Attachments:** [image001.png](#)  
[image003.png](#)

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[standards at state.ma.us](#)

Subject: The ETRM v. 4.0

BY EMAIL

Ms. Bethann Pepoli  
Acting Chief Information Officer  
Information Technology Division  
Commonwealth of Massachusetts

Dear Ms. Pepoli:

Thank you for adding Ecma 376 (Open XML) to the list of document formats approved for use by public agencies in Massachusetts via the Information Technology Division's Enterprise Technical Reference Model. I write to add my support during this policy's period of public comment and review. I urge the change be adopted.

I have worked in the technology sector in Massachusetts in both technical and business capacities for over 20 years. During that time I have seen the growth of the Internet from an unknown scientific research and collaboration tool and a governmental command and control facility to the multibillion dollar global market and forum that it is today. During that period many standards have been proposed, debated, and adopted. Some are with us today, some are not. The bottom line effect, however, is that the choice provided by having multiple standards has allowed the best technology to win in a competitive market.

The Commonwealth of Massachusetts is of course a large user of technology with a wide array of systems to meet diverse needs. While the Commonwealth's end is to

serve its citizens, its technology operations should not, in principal, differ substantially from any enterprise in the marketplace.

Like any responsible organization, government agencies should seek the most value, not just the cheapest price, for their dollar. However, the Information Technology Division should not unbalance the marketplace by enforcing procurement biases that prevent some vendors and suppliers from competing.

Also a concern is the unseen impact of limiting choice for government agencies on the business that do business with them. How will limiting their choice impact the technology decisions of their vendors? Is it really the government's right to limit the choices of private sector vendors regarding their in-house technology use? Of course not. Thanks to your efforts that will not come to be.

As a solutions provider that works with governmental agencies I make every effort to provide the most value possible in our efforts. However, no provider, no matter how accomplished, can maximize value for dollar if its hands are tied by restrictive policies that limit the best technology options from being implemented. The ETRM v. 4.0 corrects one major flaw in the policy – and this correction is a step in the right direction.

The reasons for my support are numerous, and I believe that they coincide with the interests of the citizens of Massachusetts and the goals of state government. In brief:

1. Open XML is an open industry standard, approved by Ecma International after standardization by a multi-party committee. The standard can be implemented by anyone.
2. Open XML is a robust standard with support for multiple languages, assistive technologies, financial formulas, and more. Many state agencies will benefit from the breadth of functionality available under the standard.
3. Together ODF and Open XML garner wide industry support. Without Open XML approval, Microsoft and companies like mine who specialize in Microsoft implementations would have been locked out of government contracting, to the detriment of government employees and citizens.
4. Competitive choice among ODF, Open XML, PDF, and future standards benefits users and innovation. Locking in a single choice in perpetuity runs against the grain of technology's evolution and would be



a disservice to government and citizens in the long run.

5. Accepting Open XML in the ETRM will save taxpayer dollars since no clear cost of wholesale state conversion to ODF has ever been provided.

Thank you for your support for Open XML.

Respectfully Submitted,

Signature:

Company: Bad Bamboo, LLC

Printed Name: Stephen R. Brown

Title: CEO

Stephen Brown

[stephen at badbamboo.net](mailto:stephen@badbamboo.net)

203-533-5371 (office)

860-834-3894 (mobile)

[www.badbamboo.net](http://www.badbamboo.net)

**From:** [William L. Pardee](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ETRM 4.0; OOXML  
**Date:** Wednesday, July 18, 2007 9:07:34 PM  
**Attachments:**

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To whom it may concern:

I am writing in reference to the proposed ETRM version 4.0, in particular the proposal to designate ECMA-376 Office Open XML Formats (Open XML) technical specification as an alternative to Open Document Format (ODF) for document exchange and archiving. For your information, I am a Commonwealth employee and an attorney. I have no real technical knowledge, but considerable interest in these issues. I have followed the movement toward open document formats with particular interest, since I have a great deal of experience as one who has done my own document preparation for upwards of 20 years, and as a designated custodian of public records.

In my opinion, ECMA-376 is entirely superfluous going forward as a format for either purpose. Propagating a second format (I would not count Portable Document Format, which serves distinct functions) at best will increase confusion and overhead costs due to the need to support two formats. At worst, Open XML may prove to be a Trojan horse that, once accepted into the ETRM, will defeat the goal of an open, freely usable and widely adopted standard.

First: Open XML is superfluous. The principal, perhaps sole selling point for Open XML is its purported compatibility with the "billions" of legacy documents. But in reality Open XML is not compatible with all legacy documents, only (at best) those produced using a version of Microsoft Word. (I myself have used WordPerfect for 20 years, and I can assure you that Microsoft Word does not support my legacy document formats.) Thus, if ITD accepts this argument for a second standard, it must logically entertain a variant "open" format for every word processor now or formerly on the market, so long as the proponent of the

standard gets an ECMA seal of approval.

In reality, all "legacy" documents will have to be translated into a new open format for preservation and future access. The very introduction of Open XML itself proves that even Microsoft Word-created legacy documents will have to be translated to a new format. Thus, Open XML does not offer to save labor as against translating legacy documents into PDF (if complete fidelity of appearance is desired) or ODF (if for editing or reusing) formats.

Indeed, looked at in this way, it is apparent that the major selling point of Open XML is an integrated translation function that could just as easily be separated from the open format itself, thereby making the format a good deal more streamlined (and probably easier for competitors to implement). For example, Open Office is capable of reading Word-created legacy documents and translating them into ODF. Would ITD accept the combined function as offered in Open Office (a truly open format since the source code is also open) as yet another variant, on a par with ECMA-376? This, I think, shows that the principal selling point for Open XML is actually a vestige of prior closed standards, not a true feature of an open standard.

Second: Acceptance of Open XML will increase overhead costs and confusion, and decrease efficiency. This point seems self-evident. Allowing additional open document formats essentially exchanges Babel for "open" Babel. Perhaps the open-ness of the formats will reduce software costs as compared to the present situation, but having several incompatible open formats to serve the same purpose will either require software developers to incur the expense of supporting both (or many, if the logic of this proposal is pursued) formats, or will force agencies and the public to purchase multiple software packages to ensure that public documents are indeed accessible. This seems a betrayal of the purposes identified in ETRM 3.6. In particular, it hardly serves the goal of open government to proliferate formats needlessly. One can hide documents in the open, and this proposal makes it easier to conceal public documents by artful manipulation of formats -- particularly if other vendors avail themselves of this precedent.

Third: Open XML may prove to be a Trojan horse. While I appreciate ITD's effort to maintain neutrality with respect to open formats, Open XML falls short of a true open standard, when measured by the criteria expounded in ETRM 3.6. I submit that unless and until Open XML fully

satisfies those criteria, it would be extremely foolish to accept this standard at face value.

Here is how ITD has defined open standards:

"Specifications for systems that are publicly available and are developed by an open community and affirmed by a standards body. . . . Open standards imply that multiple vendors can compete directly based on the features and performance of their products. It also implies that the existing information technology solution is portable and that it can be removed and replaced with that of another vendor with minimal effort and without major interruption"

Open XML was certainly not developed by an open community, and the very lack of transparency with respect to its development is cause for concern regarding the future. It has been approved as a standard by ECMA, but one can hardly call it an "open" standard in the true sense, since ECMA (by all accounts I have seen) accepted the standard as specified by Microsoft (including many elements, particularly relating to legacy formats, that do not actually specify); does not require that the standard be made available without fees or royalties for use by competitors; and recognizes Microsoft's right to extend the standard in the future with proprietary extensions. In this regard, it is significant that the national body responsible for reviewing proposed ISO standards recently declined to approve ECMA-376 (the process is ongoing).

Furthermore, it remains to be shown that Open XML is a standard that will allow "multiple vendors [to] compete directly based on the features and performance of their products." According to various accounts, it is an ungainly standard, with many elements that do not allow for replication by Microsoft's competitors, particularly those having to do with formatting of legacy Word documents. To the extent that these elements are part of the standard, they could still be employed by Microsoft to cripple competitors' ability to read, edit and save new documents created in Word. And Microsoft remains free to "extend" its standard in ways that impede document exchange between competing programs. As things stand, it seems evident that once this "standard" is accepted, it will be "enhanced" in ways that will prevent replacement of incumbent software "with minimal effort and without major interruption." In any event, there is no implementation of Open XML on the market, except for that (reportedly nonconforming) in the most recent version of

Word.

In light of the closed process followed in developing this standard, and of ECMA's extremely permissive rules for recognizing a standard, ITD should at the least hold off recognizing Open XML until the standard has been recognized by ISO, and has been implemented by at least one developer other than and independent of Microsoft.

Preferably, ITD should not accept Open XML as an alternative open document standard, for reasons previously stated.

Yours truly,

William L. Pardee  
wpardee at attglobal.net

**From:** [Dan Keshet](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** ODF and OOXML  
**Date:** Wednesday, July 18, 2007 8:28:18 PM  
**Attachments:**

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I am an independent software developer born and raised in Massachusetts. I am writing to support the removal of ECMA 376 (OOXML) from the Enterprise Technical Reference Model. Supporting the OOXML standard is incompatible with many of the stated goals in the Vision section of the ETRM.

I'm sure that you agree that continued use of poorly-documented, legacy formats such as "Microsoft Word 6 format" or "Word Perfect format" would be incompatible with the Commonwealth's goals of greater future flexibility and reduced costs. However, OOXML includes numerous elements such as "autoSpaceLikeWord95", "useWord97LineBreakRules", "useWord2002TableStyleRules", "lineWrapLikeWord6", and "suppressTopSpacingWP" [1]. These elements do not specify behavior, but instead refer developers to the behavior of discontinued, unsupported legacy applications running on legacy operating systems, many of which do not run on modern hardware. Essentially, the Commonwealth would not be rid of the old, poorly-documented legacy formats, it would have merely moved them into a new container, undermining the entire point of the ETRM.

The Open Document Format provides a level playing field that independent software developers like myself need to compete. The extensive use of ODF by the free software project "KOffice" shows that well-written, open standardized document formats like ODF can reduce costs to software developers greatly. Small developers such as myself can easily work with such formats, in part or whole, to create tools that would be helpful to the Commonwealth. On the other hand, working with large, ambiguous, legacy-laden formats such as OOXML, is so difficult that the Commonwealth would be limiting its potential market flexibility severely.

I urge you to drop OOXML from the ETRM.

Thank you,

Daniel Keshet  
(currently of) Austin, Texas

[1] I drew these examples from Wikipedia, but there are numerous other lists of such elements.

[http://en.wikipedia.org/w/index.php?title=Office\\_Open\\_XML&oldid=145531728](http://en.wikipedia.org/w/index.php?title=Office_Open_XML&oldid=145531728)

**From:** [Bruce Williams](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Public Comment on ETRM Draft 4.0  
**Date:** Wednesday, July 18, 2007 8:11:14 PM  
**Attachments:**

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July 19, 2007

Information Technology Division  
Commonwealth of Massachusetts  
Attention: Beth Ann Pepoli

Re: Public Comment on ETRM Draft 4.0

Dear Ms. Pepoli,

While I am not a citizen of Massachusetts or even the United States of America, I am Australian. As you are quite aware there are many people around the world that are watching the ITD very closely, as the general opinion of supporters of Open Standards is that any decision made on current matters will have far reaching effects around the world with other groups that are planning on adopting Open Standard document formats for themselves.

I am sure that you will have received many responses from others more qualified in public policy than myself, however I have worked in the IT / Telecommunications industry for over ten years and in that time have come to understand that true Open Standards are key to building an infrastructure where different systems can interoperate and share information freely.

I feel that the major differences between the ISO/IEC 26300:2006 Open Document Format (ODF) and Microsoft's Office Open XML can be found by simply reading the charters of the working groups that formulated the standards.

First, from the OASIS Open Document Format for Office Applications (OpenDocument) TC

[\[http://www.oasis-open.org/committees/office/charter.php\]](http://www.oasis-open.org/committees/office/charter.php)



----- BEGIN -----

### Statement of Purpose

The purpose of this TC is to create an open, XML-based file format specification for office applications.

The resulting file format must meet the following requirements:

1. it must be suitable for office documents containing text, spreadsheets, charts, and graphical documents,
2. it must be compatible with the W3C Extensible Markup Language (XML) v1.0 and W3C Namespaces in XML v1.0 specifications,
3. it must retain high-level information suitable for editing the document,
4. it must be friendly to transformations using XSLT or similar XML-based languages or tools,
5. it should keep the document's content and layout information separate such that they can be processed independently of each other, and
6. it should 'borrow' from similar, existing standards wherever possible and permitted.

----- END -----

By reading that statement, it can be seen that the group has developed a high quality document standard for the future. Utilising existing standards and well understood data formats to ensure ease of implementation and reuse of existing tool sets. Many opponents of ODF will claim that it is simply the default format used by the OpenOffice.org or StarOffice products, this however is incorrect. While ODF is based on these formats, many changes and enhancements were made to the format by the OASIS working group and both OpenOffice.org and StarOffice had to be updated to maintain compatibility as ODF was developed. Many other software packages have adopted or are able to work with ODF as seen here [[http://en.wikipedia.org/wiki/OpenDocument\\_software](http://en.wikipedia.org/wiki/OpenDocument_software)].

Second, from ECMA TC45 - Office Open XML Formats [<http://www.ecma-international.org/memento/TC45.htm>]

----- BEGIN -----

Scope:

The goal of the Technical Committee is to produce a formal standard for office productivity applications within the Ecma International standards process which is fully compatible with the Office Open XML Formats. The aim is to enable the implementation of the Office Open XML Formats by a wide set of tools and platforms in order to foster interoperability across office productivity applications and with line-of-business systems. The Technical Committee will also be responsible for the ongoing maintenance and evolution of the standard.

----- END -----

I think the first sentence says it all! "The goal of the Technical Committee is to produce a formal standard ... which is fully compatible with the Office Open XML Formats". In this case ECMA has not produced a standard, they have produced a specification. An (incomplete!) specification of a single vendors proprietary document format. For this reason alone I believe that Microsoft's Office Open XML (OOXML) cannot be considered an Open Standard, it may be considered a publicly available specification, however there is no guarantee that the documents produced by future versions of Microsoft's Office software will conform to this specification.

Thankyou for taking the time to consider this feedback. I hope to see a future where information is available to all who wish to see it, no matter what computer system, operating system or software they choose to use.

Yours sincerely,  
Bruce Williams.

**From:** [Eva Linn](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ODF  
**Date:** Wednesday, July 18, 2007 8:09:44 PM  
**Attachments:**

---

Please adopt ODF open document format! thank you Eva Linn

**From:** [Sam Hiser](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** article bearing on the ETRM 4.0 discussion...  
**Date:** Wednesday, July 18, 2007 7:06:04 PM  
**Attachments:**

---

<http://fussnotes.typepad.com/plexnex/2007/07/ooxml-under-the.html>

**From:** [Leon Rabin](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Open Document Format  
**Date:** Wednesday, July 18, 2007 7:02:31 PM  
**Attachments:**

---

I urge that Massachusetts adopt the Open Document Format for the state. If we let Microsoft technology prevail, we stand to lose in the innovation technology competition and let a restricted technology tell us what we must use. ODF will allow Mass. to interact with world wide technologies and will allow access to international standards. Open Office XML will be restrictive and end up restricting access to documents. Do not allow lobbyists for non-open source programs to have us restrict our leadership in the technology sphere.

The history of MS technology is full of bugs and problems. Do not adopt their system, adopt the Open Document Format system and stay in the forefront of technology.

Leon Rabin

**From:** [NRiley1034 at aol.com](mailto:NRiley1034@aol.com)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Microsoft support  
**Date:** Wednesday, July 18, 2007 6:33:36 PM  
**Attachments:**

---

I am in favor of allowing support of xml to accept format. Thank you Norma Riley

---

Get a sneak peek of the all-new [AOL.com](http://AOL.com).

**From:** [Jim Prendergast](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Comment on ETRM v. 4.0  
**Date:** Wednesday, July 18, 2007 4:11:19 PM  
**Attachments:**

---

To Whom It May Concern,

It is admirable to note that the Commonwealth of Massachusetts is not above listening to and understanding the needs and concerns of the consumer. The recommendation to include Office Open XML in ETRM 4.0 demonstrates this listening ear and represents a pro-active position in retaining open communication channels.

As you know, Microsoft Office is widely used throughout the Commonwealth, from government agencies to everyday consumers. The mandate found in ETRM 4.0's predecessor that ODF be the only approved file format, put individuals at all socioeconomic levels in a position that would have forced them to substantially alter the way they communicated with the Commonwealth.

In essence, ODF, while it may be a good file format, was not a good fit for the public. The inclusion of Office Open XML is a solid solution to the dilemma. Office 2003 and 2007 widely use this version of XML. Additionally, OO XML is now an open standard, just like ODF, having received approval from ECMA (an international standards organization) in December 2006. Thus, inclusion of OO XML solves the Commonwealth's needs for archival quality file formats and re-establishes the lines of communications with her citizenry.

There is one more satisfying aspect of adding Office Open XML to the approval list found in ETRM 4.0: Competition and choice. By having a variety of standards and formats to choose from, division managers within the Commonwealth's government will be empowered to select the best solution for their document needs, not just take what is given to them, regardless of its power to solve the issues at hand.

Overall, the inclusion of OO XML solves a whole host of challenges for everyone involved. As the Executive Director of Americans for Technology Leadership and on behalf of our membership, I applaud this move and encourage you to finalize the process.

Sincerely,

Jim Prendergast  
Executive Director

Americans for Technology Leadership 



**From:** [Wrobel, Anna](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [lrotert at revonet.com;](mailto:lrotert@revonet.com)  
**Subject:** Open XML  
**Date:** Wednesday, July 18, 2007 4:08:43 PM  
**Attachments:**

---

Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Thanks,  
Anna

---

Anna P. Wrobel  
Director, Enterprise Solutions

*Current Analysis*  
21335 Signal Hill Plaza  
Second Floor  
Sterling, VA 20164 USA  
Office +1 (703) 788-3603 | Mobile +1 (703) 424-3159| Fax +1 (703) 404-9300  
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**From:** [Elizabeth Campbell](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ODF  
**Date:** Wednesday, July 18, 2007 3:07:49 PM  
**Attachments:**

---

To Whom it may Concern:

I encourage the State of Massachusetts to adopt the ODF - Open Document Format XML standard for all government computer files so as to preserve consumer choice when working with state documents in the future.

Thank you for recording my request.

--

Elizabeth Campbell  
American Falcon, Inc.  
470 Main Street  
Harwich Port, MA 02646  
508-432-7896

**From:** [Elizabeth Campbell](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ODF  
**Date:** Wednesday, July 18, 2007 3:06:04 PM  
**Attachments:**

---

Please adopt ODF Open Document Format.

--

Elizabeth Campbell  
American Falcon, Inc.  
470 Main Street  
Harwich Port, MA 02646  
508-432-7896

**From:** [Ryan Norbauer](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Mass. resident writing in opposition to OOXML  
**Date:** Wednesday, July 18, 2007 2:20:35 PM  
**Attachments:**

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I am writing to urge the State to reject the plan to accept OOXML as an acceptable document format for our state government. Merely being "open" or simply having data encapsulated in XML is not synonymous with conforming to international standards. International standards bodies were created to make sure that information can be exchanged freely without any one party or interest having a controlling stake in the format itself. To accept a "standard" defined arbitrarily by one company is to reject the very notion of standards itself.

History has shown that the sale or release of "converters" is merely a dishonest way of placating organizations into accepting non-standard formats. They rarely work properly, but more importantly, the extra overhead means there are even less frequently actually used. If we are to commit to open standards, as we should, then not only is the addition of a corporate-defined standard unhelpful and a drain on productivity, I believe it actually does real harm to the open international standards themselves.

You work for us, the taxpayers, not any corporation. I urge you to ensure that our state's public information remain in the hands of the public and multi-lateral bodies with the public interest in mind, not those of a small group of private interests. Please reject the proposals to allow OOXML.

Ryan Norbauer  
8 Lyman St, Fl 1  
Beverly MA 01915

**From:** [Tom Schatz](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Massachusetts Enterprise Technical Reference Model open comment period  
**Date:** Wednesday, July 18, 2007 1:46:31 PM  
**Attachments:** [image001.png](#)  
[oledata.mso](#)  
[OO XML Letter \(July 18 2007\) PDF.PDF](#)  
[image003.gif](#)

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July 18, 2007

To Whom It May Concern:

On behalf of the 23,333 members and supporters of Citizens Against Government Waste (CAGW) in Massachusetts, I would like to express our support of the addition of Office Open XML (OO XML) as part of the Enterprise Technical Reference Model (ETRM) 4.0, currently being recommended during this open comment period by the Massachusetts Information Technology Division.

The previous version of ETRM mandated the exclusive use of the Open Document Format. Such a single-solution environment is wasteful and unacceptable, as it will inevitably lead to higher costs, sloppy service, and a non-competitive procurement process.

The driving force behind the nation's free market economy is competition, which gives consumers, businesses, and governments a wide range of choices to meet their needs and forces vendors to continually search for ways to reduce costs, improve customer service and enhance product offerings. By adding OO XML to the ETRM, there will be more choices within the

procurement process and more cost-effective solutions to the Commonwealth's technology needs.

CAGW has advocated for open procurement at the federal and state level for many years, and specifically called for governments to refrain from establishing a preference on one type of software over another. Adding OO XML to the ETRM is a good first step in the right direction and we encourage you to continue to make technology policy more competitive.

Again, thank you for your efforts in this matter.

Sincerely,

**Thomas A. Schatz**  
**President**  
**Citizens Against Government Waste**  
**1301 Connecticut Avenue, NW**  
**Washington, DC 20036**  
**Phone: (202) 467-5300**  
**Fax: (202) 467-4253**  
**[tschatz at cagw.org](mailto:tschatz@cagw.org)**

**From:** [Alan Day](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Open XML Standards  
**Date:** Wednesday, July 18, 2007 1:45:40 PM  
**Attachments:**

---

I completely support the move to include Open XML in the approved document standards to be used by the Commonwealth of Massachusetts.

There is an enormous investment in current documents and systems based on the standards other than the currently approved standard in the Commonwealth. This new standard will preserve that existing investment.

The Open XML standard will also assure that the Commonwealth has access to all possible competitive technologies when new system development efforts arise. This wider competition will keep prices and overall costs down more than if the Commonwealth narrows compliant technology options.

Further, the labor market for personnel with skills related to technologies that support OpenXML is characterized by lower costs, given the wider availability of that skill base, than the labor pool for Open Source developers, even places such as the high tech centers such as Massachusetts. Many regions of the country have very little supply of Open Source skilled developers, and all the software that will be developed in those states will become unavailable to the Commonwealth if the Open XML standard is maintained, which flies in the face of the adoption of open standards which are supposed to encourage exchange and reuse of systems and capabilities among government jurisdictions.

My company has been a trusted systems developer and a firm on the Commonwealth's blanket IT Services contracts longer than any other firm. We have also worked for 20 other states over the years. Our experience is that the adoption of Open XML is the right way for the Commonwealth to proceed. There is no downside and a considerable upside to doing so.

Alan Day  
President

Systems Engineering, Inc.  
657 Main Street  
Waltham, MA 02451  
781-736-9100 x215  
781-704-4705 cell



**From:** [Robin Kavanagh](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Support for Open XML  
**Date:** Wednesday, July 18, 2007 1:23:03 PM  
**Attachments:**

---

Technology policies should enable gvt agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will competition and innovation.  
Please support Open XML.

**From:** [Durkin, James](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Letter from AFSCME Council 93  
**Date:** Wednesday, July 18, 2007 12:45:35 PM  
**Attachments:** [Scan001.PDF](#)

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Dear Sir or Madam,

Attached is a letter from Anthony Caso, Executive Director of AFSCME Council 93 and Peter Wright, Council 93's Director of Legislation, Political Action and Communications. If you have any difficulty opening/viewing the attachment please let me know via e-mail.

Thank you,

Jim Durkin

**From:** [Mrc Gran](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [campaigns at fsf.org;](#)  
**Subject:** Microsoft OOXML is not an open standard. DO NOT USE OR ALLOW OOXML.  
**Date:** Wednesday, July 18, 2007 12:44:34 PM  
**Attachments:**

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Dear CIO Bethann Pepoli,

ODF is the former open SXW format that was taken and transformed into a standard by a committee comprising several Office software makers. It's suppose to describe the normal features that anyone should expect from any Word processing application, be it OpenOffice.org, KWord, AbiWord, Corel Word Perfect, etc. all this in a perfectly neutral way. It was designed with a function in mind (storing word processing documents in an open and interoperable way). Its benefits are comparable to the standardisation of HTML.

OpenXML (OOXML) is Microsoft trying to translate its proprietary DOC file inside a XML container (because it's a big buzzword) and propose it as a standart to ECMA (because everyone is speaking about ODF being an ISO standard). It describes not only what is to be expected from a word processor, but also all MS-Word specific microsoftism. It was designed with a specific software in mind (and partly derives from the internal functioning of MS-Word). It's only a small improvement over the previous MS XML format (which had a lot of informations hidden in a binary blob).

Therefore, only ODF is an Open Standard: it is the only way to avoid lock-in to specific software vendors and therefore the only model which provides long-term historical archive recoverability, secure exchange and freedom of information for everyone.

OOXML has a series of technical disadvantages which make it undesirable to use as a standard, and it will cost much more in terms of freedom and money:

- 1) OOXML is much longer, complex, ambiguous, difficult to understand,

implement and validate and it contains proprietary information which \*only\* Microsoft knows how to implement. Indeed, OOXML will \*create\* many problems for correct document interoperability:

- ODF spec page count: [722 \[iso.org\]](#).

- OpenXML spec page count: [6000 \[regdeveloper.co.uk\]](#)!!

2) OOXML has been narrowly crafted to accommodate a single vendor (Microsoft)'s applications. Its extreme length (over 6,000 pages) stems from it having detailed every wart of MS Office in an inextensible, inflexible manner. This is not a specification; this is a DNA sequence. (see <http://www.robweir.com/blog/2006/01/how-to-hire-guillaume-portes.html>)

3) OOXML "Standard" has bloated its specification with features that no one but Microsoft will be able to interpret: [2.15.3.6](#) autoSpaceLikeWord95 (Emulate Word 95 Full-Width Character Spacing) This element specifies that applications shall emulate the behavior of a previously existing word processing application (Microsoft Word 95) when determining the spacing between full-width East Asian characters in a document's content. [Guidance: To faithfully replicate this behavior, applications must imitate the behavior of that application, which involves many possible behaviors and cannot be faithfully placed into narrative for this Office Open XML Standard. If applications wish to match this behavior, they must utilize and duplicate the output of those applications. It is recommended that applications not intentionally replicate this behavior as it was deprecated due to issues with its output, and is maintained only for compatibility with existing documents from that application. end guidance] What should we make of that? Not only must an interoperable OOXML application support Word 12's style of spacing, but it must also support a different way of doing it in Word 95. And by the way, Microsoft is not going to tell you how it was done in Word 95, even though they are the only ones in a position to do so.

4) Similarly, we have in OOXML: [2.15.3.26](#) footnoteLayoutLikeWW8 (Emulate Word 6.x/95/97 Footnote Placement) This element specifies that applications shall emulate the behavior of a previously existing word processing application (Microsoft Word 6.x/95/97) when determining the placement of the contents of footnotes relative to the page on which the footnote reference occurs. This emulation typically involves some and/or all of the footnote being inappropriately placed on the page following the footnote reference. [Guidance: To faithfully replicate this behavior, applications must imitate the behavior of that application, which involves many possible behaviors and cannot be faithfully placed into narrative for this Office Open XML Standard. If applications wish to match this

behavior, they must utilize and duplicate the output of those applications. It is recommended that applications not intentionally replicate this behavior as it was deprecated due to issues with its output, and is maintained only for compatibility with existing documents from that application. end guidance] Again, in order to support OOXML fully, and provide support for all those legacy documents, we need to divine the behavior of exactly how Word 6.x "inappropriately" placed footnotes. The "Standard" is no help in telling us how to do this. In fact it recommends that we don't even try. However, Microsoft continues to claim that the benefit of OOXML and the reason why it deserves ISO approval is that it is the only format that is 100% backwards compatible with the billions of legacy documents. But how can this be true if the specification merely enumerates compatibility attributes like this without defining them ? Does the specification really specify what it claims to specify?

5) In OOXML are *\*many\** other examples of proprietary implementation like these which only Microsoft knows how to implement:

- **lineWrapLikeWord6** (Emulate Word 6.0 Line Wrapping for East Asian Text)
- **mwSmallCaps** (Emulate Word 5.x for Macintosh Small Caps Formatting)
- **shapeLayoutLikeWW8** (Emulate Word 97 Text Wrapping Around Floating Objects)
- **truncateFontHeightsLikeWP6** (Emulate WordPerfect 6.x Font Height Calculation)
- **useWord2002TableStyleRules** (Emulate Word 2002 Table Style Rules)
- **useWord97LineBreakRules** (Emulate Word 97 East Asian Line Breaking)
- **wpJustification** (Emulate WordPerfect 6.x Paragraph Justification)
- **shapeLayoutLikeWW8** (Emulate Word 97 Text Wrapping Around Floating Objects)

6) There is **already a standard ISO26300 named Open Document Format (ODF)** : a dual standard adds costs, uncertainty and confusion to industry, government and citizens;

7) There is **no provable implementation of the OOXML specification**: Microsoft Office 2007 produces a special version of OOXML, not a file format which complies with the OOXML specification;

8) There is **missing information from the specification** document, for example how to do a **autoSpaceLikeWord95** or **useWord97LineBreakRules**;

- 9) More than **10%** of the examples mentioned in the proposed standard do not **validate** as XML;
- 10) There is **no guarantee that anybody can write a software** that fully or partially implements the OOXML specification **without being liable to patent damages or patent license fees by Microsoft** ;
- 11) This **standard proposal conflicts with other ISO standards**, such as ISO 8601 (Representation of dates and times), ISO 639 (Codes for the Representation of Names and Languages) or ISO/IEC 10118-3 (cryptographic hash);
- 12) There is **a bug in the spreadsheet file format which forbids to enter any date before the year 1900**: such bugs affects the OOXML specification as well as software versions such as Microsoft Excel 2000, XP, 2003 or 2007.
- 13) This **standard proposal has not been created by bringing together the experience and expertise of all interested parties** (such as the producers, sellers, buyers, users and regulators), but by Microsoft alone.

Please, take one minute or two to read the problems with OOXML and see the uneasiness with which users are feeling with its (God forbids) potential adoption:

<http://www.nooxml.org/petition>

<http://fsfeurope.org/documents/msooxml-questions>

<http://www.groklaw.net/staticpages/index.php?page=20051216153153504>

Please do what governments should do and choose and allow only the formats which are actually free and open like ODF and which will promote future well-being to the society and free information exchange.

Do not use or allow OOXML. OOXML is not an option for any decent standard.

Yours,

M. Granada

**From:** [Barbara G. Olsavsky](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Comments supporting OpenXML  
**Date:** Wednesday, July 18, 2007 12:18:36 PM  
**Attachments:**

---

Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Barbara Olsavsky  
VP, Client Services  
PurchasingNet, Inc.  
bolsavsky at purchasingnet.com  
732-212-1500 x 3130

**From:** [Ross, Doug \(MRC\)](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** MS  
**Date:** Wednesday, July 18, 2007 11:17:49 AM  
**Attachments:**

---

Support Office open xml



**From:** [erniewallent at comcast.net](mailto:erniewallent@comcast.net)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** request support  
**Date:** Wednesday, July 18, 2007 10:56:02 AM  
**Attachments:**

---

Please support inclusion for office open XML to the list of acceptable file formats . Thank you, Ernest M. Wallent DMD (retired) 424 Middlesex Ave. Wilmington MA 01887

**From:** [Bert Jackson](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Support Open Doc Format  
**Date:** Wednesday, July 18, 2007 10:55:54 AM  
**Attachments:**

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Please consider this a vote FOR using the ODF XML format for storage of commonwealth documents. This ensures accessibility for all, without requiring one particular vendor (i.e. Microsoft) to access public documents.

--

Bert Jackson  
Koa Interactive Media, LLC  
23 H2 White's Path  
South Yarmouth, MA 02664  
508 398 0026 P  
508 398 0046 F  
bert at koamedia.com  
<http://www.koamedia.com>

*marketing-inspired web solutions  
corporate :: resort :: e-learning*

**From:** [David Wyndham](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Keep ODF Standard  
**Date:** Wednesday, July 18, 2007 9:35:13 AM  
**Attachments:**

---

To Whom it may Concern:

I encourage the State of Massachusetts to adopt the ODF - Open Document Format XML standard for all government computer files so as to preserve consumer choice when working with state documents in the future. It is in the consumers' best interest to be able to open and read tax, legal, healthcare, business, voting or other government created files without having to purchase costly proprietary software.

Thank you for recording my request.

--

David Wyndham  
Brewster, MA

**From:** [WILLIAM sullivan](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ODF  
**Date:** Wednesday, July 18, 2007 9:08:24 AM  
**Attachments:**

---

Please adopt the ODF open document format. There are many Mac users. Thanks  
you, Bill Sullivan

**From:** [Raphael Bosshard](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** OpenXML, an open standard?  
**Date:** Wednesday, July 18, 2007 9:04:54 AM  
**Attachments:**

---

It has recently come to my knowledge that Massachusetts is planning to bless the Microsoft OpenXML document format with the addition to the Massachusetts list of usable open standards.

As a long term software developer with a Masters degree in information technologies I don't consider the OpenXML document format to be a truly open format. While it may use an open standard to describe document content (namely XML [1]), many specification details used to describe OpenXML refer to proprietary methods and functions used in older Microsoft products.

These methods and functions are only available to Microsoft, third-party developers do not have any means to get details knowledge about the inner workings of those methods.

To draw an analogy; Imagine I, as a developer, would release a software product. The inner workings of that software product are considered trade secrets and are therefore protected by law. Now imagine I'd try to create an open standard based upon those trade secrets. The result would be something alike: "Do it as I do it in my software, using function N." No one without access to the source of my software, the trade secret, would be able to satisfy the requirements of that "open standard".

This is exactly what Microsoft is doing with OpenXML. To present one example:

"2.15.3.6 autoSpaceLikeWord95 (Emulate Word 95 Full-Width Character Spacing)  
To faithfully replicate this behavior, applications must imitate the behavior of that application, which involves many possible behaviors and cannot be faithfully placed into narrative for this Office Open XML Standard. If applications wish to match this behavior, they must utilize and duplicate the output of those applications."

- citing from the Microsoft Office OpenXML Specification

I bring to attention:

"[...]cannot be faithfully placed into narrative for this Office Open XML Standard [...]"

"[...] duplicate the output of those applications [...]"

This part of the OpenXML specification is trying to enforce emulation of the behaviour of a proprietary software. More so; the specification admits that this specification is not complete and implementors are deferred to Word95, using a proprietary software as a reference point. This is not something I'd like to see in an open specification.

This is only one example but I happily provide a list of further examples. These are only a few, many more alike are to be found in the specification:

- # lineWrapLikeWord6 (Emulate Word 6.0 Line Wrapping for East Asian Text)
- # mwSmallCaps (Emulate Word 5.x for Macintosh Small Caps Formatting)
- # shapeLayoutLikeWW8 (Emulate Word 97 Text Wrapping Around Floating Objects)
- # truncateFontHeightsLikeWP6 (Emulate WordPerfect 6.x Font Height Calculation)
- # useWord2002TableStyleRules (Emulate Word 2002 Table Style Rules)
- # useWord97LineBreakRules (Emulate Word 97 East Asian Line Breaking)
- # wpJustification (Emulate WordPerfect 6.x Paragraph Justification)
- # shapeLayoutLikeWW8 (Emulate Word 97 Text Wrapping Around Floating Objects)

Because of this I strongly urge you not to add the OpenXML specification to the list of usable open standards.

Sincerely yours,  
Raphael Bosshard

[1] <http://www.w3.org/XML/>

**From:** [Jilk340 at aol.com](mailto:Jilk340@aol.com)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Documents  
**Date:** Wednesday, July 18, 2007 8:59:24 AM  
**Attachments:**

---

Dear Ms/Sir

Please adopt the "ODF Document File".

This is of importance to we citizens of the Commonwealth that are not high end users of the net.

Thank for the consideration.

John Ilg  
340 Whidah Rd  
North Chatham, Ma 02650

\*\*\*\*\*

Get a sneak peek of the all-new AOL at <http://discover.aol.com/memed/aolcom30tour>

**From:** [Robert F. Smith](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ODF Open Document Format  
**Date:** Wednesday, July 18, 2007 8:46:09 AM  
**Attachments:**

---

In order to maintain proper internet accessibility, I urge you to adopt an ODF Open Document Format. Thank you.

--

Robert F. Smith, Esq.  
610 Main Street - Route 28  
P. O. Box 1101  
Dennis Port, Massachusetts 02639

Telephone (508) 394-1377  
Fax (508) 394-1826  
Email [rsmithe@capecod.net](mailto:rsmithe@capecod.net)

Communications from me may contain or incorporate federal tax advice. Under recently promulgated US Internal Revenue Service (IRS) standards, I am required to inform you that only formal, written tax opinions meeting IRS requirements may be relied upon by taxpayers for the purpose of avoiding tax-related penalties. Accordingly, this communication is not intended or written to be used, and it cannot be used, for the purpose of avoiding tax-related penalties under the Internal Revenue Code.

<!--[if !supportEmptyParas]--> <!--[endif]-->

<!--[if !supportEmptyParas]--> <!--[endif]-->



**From:** [Andrew D. Ramsey](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [lrotert at revonet.com;](mailto:lrotert@revonet.com)  
**Subject:** OpenXML  
**Date:** Wednesday, July 18, 2007 5:19:57 AM  
**Attachments:**

---

I believe the support of the OpenXML format will allow all agencies large and small to better communicate, facilitate, and collaborate on an unprecedented level. OpenXML is another step in the right direction to allow for the sharing of information between our government agencies.

Thank you,

Andrew D. Ramsey  
Precision Solution Group, LLC  
8388 Sealyham Drive  
Reynoldsburg, OH 43068  
C: 1-614-519-4042  
F: 1-614-367-9108

**From:** [Ron Plaster](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [lrotert at revonet.com;](mailto:lrotert@revonet.com)  
**Subject:** Open XML  
**Date:** Wednesday, July 18, 2007 3:33:58 AM  
**Attachments:**

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There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](http://openxmlcommunity.org) and [openxmldeveloper.org](http://openxmldeveloper.org), and many independent developers and their customers are benefiting from this new technology.

Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

*RonPlaster*

[RPLASTER AT RRSBS.COM](mailto:RPLASTER@RRSBS.COM)

6605 PISGAH RD.  
TIPP CITY, OH 45371

937.667.1188  
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**From:** [Leslie P. Polzer](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** OOXML document standard considered problematic  
**Date:** Wednesday, July 18, 2007 1:34:48 AM  
**Attachments:**

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Dear Sir or Madam,

the state of Massachusetts is considering the adoption of the OOXML document standard alongside the ODF standard.

Adopting two different standards is not a bad idea, in general, but experts have found numerous problems[1] in the OOXML specification.

The worst issues with this standard are as follows:

- \* its size of literally thousands of pages
- \* its proprietary extension provisions
- \* its inconsistencies

Especially the first two problems are dire, because they prevent or severely hinder third parties from implementing software that handles the document format.

While ODF has problems, too, they are more of a minor nature and not as significant as those of OOXML, because they do not prevent anyone from supporting the format.

I strongly suggest to reconsider adopting OOXML as a standard.

For a short list of questions that need to be answered before OOXML can be honestly considered an open standard, see [2].

Best regards,

Leslie P. Polzer

- [1] [http://www.grokdoc.net/index.php/EOOXML\\_objections](http://www.grokdoc.net/index.php/EOOXML_objections)
- [2] <http://fsfeurope.org/documents/msooxml-questions>

**From:** [Peter & Perki Sweet](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Public Comment on ETRM Draft 4.0  
**Date:** Wednesday, July 18, 2007 12:26:29 AM  
**Attachments:**

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July 17, 2007

Information Technology Division  
Commonwealth of Massachusetts  
Attention: Beth Ann Pepoli

Re: Public Comment on ETRM Draft 4.0

Dear Ms. Pepoli:

I am writing to comment on the proposed acceptance of the Microsoft OOXML document format as an open standard in ETRM Draft 4.0. I am an application developer at a state agency in WA, which I do not name as I am speaking for myself and am not authorized to speak for my agency on this issue. I have been involved with computers in the state environment since 1980, and have worked as a programmer, systems analyst, part-time data and database administrator, computer support technician, and GIS Analyst. During this time, I have repeatedly encountered the issue of computer data stored in obsolete formats, whether because of media changes (5.25" floppy disks, Zip disks, 9-track tape, etc.) or version changes in the software and/or operating system required to process the data once extracted from its storage medium. This is a serious problem, and it is getting worse as time goes by and the number of obsolete storage media and data formats increases. I commend the Massachusetts ITD for recognizing it and attempting to address it.

Let me say that "open" data storage formats is precisely the correct way to address the problem in my opinion. If the data format is completely documented, the documentation is freely available, and there are no legal problems (patents, excessive royalty charges, distribution monopolies, etc.) preventing the use of the format, than anyone with the

necessary skills can produce an application to read and write the data format, and this will remain true in the future as well. Under these circumstances, the information captured in the data format is safe for the future, for as long as anyone cares. If it should be desirable at some point to convert the information from one fully-documented open format to another, this can readily be done by anyone who understands both formats. I will refer to data formats which have the characteristics noted above (completely documented, freely available, and without legal encumbrances) in these comments as "open formats." The ODF specification, already adopted by the MA ITD as an open specification, is one such "open format."

Microsoft has proposed OpenOffice XML (OOXML) as another such open format. My purpose in writing is to comment upon this proposal. In order to do so, I downloaded the specification (ECMA 376) from the ECMA website, and spent some time looking at it. My first impression was of its vast size - almost 100 mb, 5 parts plus multiple appendices, lots of small files with unfamiliar file extensions, etc. Clearly a major effort would be required to understand the OOXML specification, let alone do anything with it. I had read that the specification was incomplete; that despite its magnitude, not all the information required to fully implement the specification was present. My purpose in downloading the specification was to see if I could determine whether or not this was true. For the purpose of this determination, after briefly examining all 5 .pdf files and some of the appendices, I focused on the one labeled "Office Open XML Part 4: Markup Language Reference" (Dec 2006). This is a .pdf file of some 5220 pages, by far the largest part of the specification. This is the part that a programmer would have to understand to produce an implementation of the specification.

After looking at this part of the specification for some time, I noticed (in the table of contents) multiple uses of the work "emulate." For example, "Emulate Word 6.x/95/97 Footnote Placement" (described on page 1416), "Emulate Word 97 Text Wrapping Around Floating Objects" (on page 1442), "Emulate Word 5.x for the Macintosh Small Caps Formatting" (on page 1427), "Emulate WordPerfect 5.x Line Spacing" (on page 1462), etc.

There are at least 20 such occurrences, all referring to the operation of obsolete versions of Microsoft Word for various platforms (PC, Macintosh) or WordPerfect (3 cases). In order to consider whether the OOXML specification is "open" or not, it would be necessary to determine whether or not the information required to perform these emulations is available. I can suggest three possibilities for obtaining this

information:

- 1) Microsoft may have provided the information somewhere in the specification.
- 2) The information is freely available elsewhere (on the Internet, perhaps).
- 3) The software to be emulated might be obtained, installed, and the behavior to be emulated discovered by observation.

Regarding the first possibility, consider this example, "Emulate Word 95 Full-Width Character Spacing" from the bottom of page 1378 (lines 8-17):

"2.15.3.6 autoSpaceLikeWord95 (Emulate Word 95 Full-Width Character Spacing)"

"This element specifies that applications shall emulate the behavior of a previously existing word processing application (Microsoft Word 95) when determining the spacing between full-width East Asian characters in a document's content."

"[Guidance: To faithfully replicate this behavior, applications must imitate the behavior of that application, which involves many possible behaviors and cannot be faithfully placed into narrative for this Office Open XML Standard. If applications wish to match this behavior, they must utilize and duplicate the output of those applications. It is recommended that applications not intentionally replicate this behavior as it was deprecated due to issues with its output, and is maintained only for compatibility with existing documents from that application. end guidance]"

It is clearly stated here that the information needed to emulate this particular Word 95 behavior is NOT contained in the OOXML Specification.

The second possibility is that Microsoft has made the information available elsewhere. You probably know better than I whether this is the case or not, but I am unaware of the existence of documentation for any of Microsoft's binary document formats. I do, however, remember hearing people request this to be provided.

The last possibility is to obtain and set up a computer running Word 95 (and hence probably also Windows 95) and observe the intended behavior directly (to whatever degree this is possible). Drawing upon my experience as a computer support technician, it is my guess that this would be difficult. One would have to obtain the necessary licenses

(probably no longer available from Microsoft) for the OS and Word 95 and an old PC. I would not expect an attempt to install Windows 95 on modern hardware to succeed, due to lack of drivers. This approach doesn't seem likely to be productive, and it is hard for me to visualize a vendor suggesting it.

The observations described above can be summarized in a question: is the information needed for a programmer to implement the OOXML specification freely available, without relying upon cooperation from Microsoft, or is it not? If it is, OOXML could be considered an "open" standard. If the information required to implement the OOXML Specification, and omitted from it, is NOT freely available elsewhere, then I cannot consider the OOXML Specification "open" - and I would suggest that you not consider it "open" either.

Sincerely,

Peter C. Sweet  
4318 - 15th Avenue NE  
Lacey, WA 98516  
olysweetp at reachone.com



**From:** [William L. Pardee](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Revised ETRM; Open XML  
**Date:** Tuesday, July 17, 2007 10:48:28 PM  
**Attachments:**

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To whom it may concern:

I am writing in reference to the proposed ETRM version 4.0, in particular the proposal to designate ECMA-376 Office Open XML Formats (Open XML) technical specification as an alternative to Open Document Format (ODF) for document exchange and archiving. For your information, I am a Commonwealth employee and an attorney. I have no real technical knowledge, but considerable interest in these issues. I have followed the movement toward open document formats with particular interest, since I have a great deal of experience as one who has done my own document preparation for upwards of 20 years, and as a designated custodian of public records.

In my opinion, ECMA-376 is entirely superfluous going forward as a format for either purpose. Propagating a second format (I would not count Portable Document Format, which serves distinct functions) at best will increase confusion and overhead costs due to the need to support two formats. At worst, Open XML may prove to be a Trojan horse that, once accepted into the ETRM, will defeat the goal of an open, freely usable and widely adopted standard.

First: Open XML is superfluous. The principal, perhaps sole selling point for Open XML is its purported compatibility with the "billions" of legacy documents. But in reality Open XML is not compatible with all legacy documents, only (at best) those produced using a version of Microsoft Word. (I myself have used WordPerfect for 20 years, and I can assure you that Microsoft Word does not support my legacy document formats.) Thus, if ITD accepts this argument for a second standard, it must logically entertain a variant "open" format for every word processor now or formerly on the market, so long as the proponent of the standard gets an ECMA seal of approval.

In reality, all "legacy" documents will have to be translated into a new open format for preservation and future access. The very introduction of Open XML itself proves that even Microsoft Word-created legacy documents will have to be translated to a new format. Thus, Open XML does not offer to save labor as against translating legacy documents into PDF (if complete fidelity of appearance is desired) or ODF (if for editing or reusing) formats.

Indeed, looked at in this way, it is apparent that the major selling point of Open XML is an integrated translation function that could just as easily be separated from the open format itself, thereby making the format a good deal more streamlined (and probably easier for competitors to implement). For example, Open Office is capable of reading Word-created legacy documents and translating them into ODF. Would ITD accept the combined function as offered in Open Office (a truly open format since the source code is also open) as yet another variant, on a par with ECMA-376? This, I think, shows that the principal selling point for Open XML is actually a vestige of prior closed standards, not a true feature of an open standard.

Second: Acceptance of Open XML will increase overhead costs and confusion, and decrease efficiency. This point seems self-evident. Allowing additional open document formats essentially exchanges Babel for "open" Babel. Perhaps the open-ness of the formats will reduce software costs as compared to the present situation, but having several incompatible open formats to serve the same purpose will either require software developers to incur the expense of supporting both (or many, if the logic of this proposal is pursued) formats, or will force agencies and the public to purchase multiple software packages to ensure that public documents are indeed accessible. This seems a betrayal of the purposes identified in ETRM 3.6. In particular, it hardly serves the goal of open government to proliferate formats needlessly. One can hide documents in the open, and this proposal makes it easier to conceal public documents by artful manipulation of formats -- particularly if other vendors avail themselves of this precedent.

Third: Open XML may prove to be a Trojan horse. While I appreciate ITD's effort to maintain neutrality with respect to open formats, Open XML falls short of a true open standard, when measured by the criteria expounded in ETRM 3.6. I submit that unless and until Open XML fully satisfies those criteria, it would be extremely foolish to accept this standard at face value.

Here is how ITD has defined open standards:

"Specifications for systems that are publicly available and are developed by an open community and affirmed by a standards body. . . . Open standards imply that multiple vendors can compete directly based on the features and performance of their products. It also implies that the existing information technology solution is portable and that it can be removed and replaced with that of another vendor with minimal effort and without major interruption"

Open XML was certainly not developed by an open community, and the very lack of transparency with respect to its development is cause for concern regarding the future. It has been approved as a standard by ECMA, but one can hardly call it an "open" standard in the true sense, since ECMA (by all accounts I have seen) accepted the standard as specified by Microsoft (including many elements, particularly relating to legacy formats, that do not actually specify); does not require that the standard be made available without fees or royalties for use by competitors; and recognizes Microsoft's right to extend the standard in the future with proprietary extensions. In this regard, it is significant that the national body responsible for reviewing proposed ISO standards recently declined to approve ECMA-376 (the process is ongoing).

Furthermore, it remains to be shown that Open XML is a standard that will allow "multiple vendors [to] compete directly based on the features and performance of their products." According to various accounts, it is an ungainly standard, with many elements that do not allow for replication by Microsoft's competitors, particularly those having to do with formatting of legacy Word documents. To the extent that these elements are part of the standard, they could still be employed by Microsoft to cripple competitors' ability to read, edit and save new documents created in Word. And Microsoft remains free to "extend" its standard in ways that impede document exchange between competing programs. As things stand, it seems evident that once this "standard" is accepted, it will be "enhanced" in ways that will prevent replacement of incumbent software "with minimal effort and without major interruption." In any event, there is no implementation of Open XML on the market, except for that (reportedly nonconforming) in the most recent version of Word.

In light of the closed process followed in developing this standard, and

of ECMA's extremely permissive rules for recognizing a standard, ITD should at the least hold off recognizing Open XML until the standard has been recognized by ISO, and has been implemented by at least one developer other than and independent of Microsoft.

Preferably, ITD should not accept Open XML as an alternative open document standard, for reasons previously stated.

Yours truly,

William L. Pardee  
wpardee at attglobal.net

**From:** [Francoise JoreMcL](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ODF  
**Date:** Tuesday, July 17, 2007 10:43:24 PM  
**Attachments:**

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To Whom it may Concern:

I encourage the State of Massachusetts to adopt the ODF - Open Document Format XML standard for all government computer files so as to preserve consumer choice when working with state documents in the future.

Thank you for recording my request.

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Yahoo! oneSearch: Finally, [mobile search that gives answers](#), not web links.

**From:** [Barbara Melcher](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Open Document Format XML  
**Date:** Tuesday, July 17, 2007 9:29:52 PM  
**Attachments:**

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To Whom it may Concern:

I encourage the State of Massachusetts to adopt the ODF - Open Document Format XML standard for all government computer files so as to preserve consumer choice when working with state documents in the future.

Thank you for recording my request.

Barbara A. Melcher  
P.O. Box 185  
South Orleans, MA 02662

**From:** [Peter Herrmann](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Software options  
**Date:** Tuesday, July 17, 2007 9:15:59 PM  
**Attachments:**

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Our best interest is to preserve our right to choose what software we use now, and in the future, especially when it comes to use of State documents that may affect the ability to open and read tax, legal, health care, business, voting or other government created files.

I urge you to adopt ODF Open Document Format.

Sincerely,

Peter Herrmann

**From:** [Edgar J Young](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** ECMA 376 vs. ODF  
**Date:** Tuesday, July 17, 2007 9:08:46 PM  
**Attachments:**

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Please do not accept ECMA 376 (Microsoft's proprietary format) as an "open standard". It is not. ECMA 376 is designed (and paid for) to promote a single vendor's current and past formats. ODF is designed to provide a single "open standard" document format implementable by all (including Microsoft).

While I am not a citizen of Massachusetts, I am concerned. MA is clearly making decisions about the future which other states are likely to follow. Why would any government want more than one standard for text documents? Maintaining dual standards is expensive. ODF is good enough, and it does not eliminate the ability to compete.

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**From:** [Rob Van Dyk](#)  
**To:** [Standards \(ITD\)](#);  
**CC:**  
**Subject:** Comments on ERTM v4.0  
**Date:** Tuesday, July 17, 2007 7:42:01 PM  
**Attachments:**

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To the Government of Massachusetts,

I reviewed the major changes to the Enterprise Technical Reference Model (ETRM) v4.0, and I would like to offer my comments to an addition that was made to the Information Domain.

I feel that it would be a mistake to add ECMA-376 as a standard on the basis that the standard, as approved by ECMA International, can only be completely implemented by a single organization. The Guidelines section of the Open XML File Format on [your page](#) points out that Microsoft, Novell, and Corel will all support the standard, but this hides the fact that there are certain sections of the OOXML specification which cannot be implemented because of (a) software patents held by Microsoft Corporation, and (b) binary embedding within the format by the Microsoft Corporation. The proprietary nature inherent in OOXML does not make for a good standard, because in the end there will be a reliance on Microsoft Corporation and not Novell or Corel to fix data corruption problems since they are the only ones in control of the full body of ECMA-376.

It is worth noting that there is no value added by having OOXML in addition to ODF. These are competing standards which cover the same areas of the Information Domain (that is: Documents, Spreadsheets, Presentations). It seems silly to have two standards for doing the same type of things. This is a recipe for chaos. Please standardize on a single standard for documents, spreadsheets, and presentations.

It is also worth mentioning the track record of the major products that supported the Legacy versions of these information standards. OpenOffice, the most popular suite of office software which supports ODF, has supported (to the best of its capability) the ability to Open, Read, and Modify \*.doc, \*.xls, and \*.ppt since

version 1.0. Meanwhile, without a special patch (<http://sourceforge.net/projects/odf-converter>), it is impossible to Open, Read, and Modify \*.odt, \*.ods, and \*.odp files in Microsoft Office.

The major reason to have standards is to prevent Vendor Lock-in, and it is evident that ECMA-376 is intended to push the Microsoft Office suite of products, so the Microsoft can position itself to sell and resell licenses to the state every couple of years. Please do not opt to take a path down a road that will lead to costly software purchases when there are many residents of Massachusetts who are active contributors to projects that enhance and improve products that support the ODF format everyday. Instead, use the software that is partially developed for you by your taxpayers, instead of using your taxpayers money to buy software that is developed by monopolizing corporations under the false pretensions of open standards.

Thank you for your time,  
Robert Van Dyk

**From:** [Jonathan Olas](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** proposal to use the real ODF Open Document XML format  
**Date:** Tuesday, July 17, 2007 7:36:48 PM  
**Attachments:**

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Hi

I want to make my point that having Massachusetts adopt a broadly accepted Open Document Format for using XML file types available for use by any person who has XML compatible software is the best idea. The ODF file type will allow future computer users to easily open and read the documents created with todays software without the cost of having to buy a proprietary Office format made by a single vendor.

In order to avoid vendor lock-in and allow consumer choice I want to encourage the Mass State Government to adopt a non-vendor specific file type that is open to any person who has common word processing software available from numerous makers, whether today, tomorrow, or many years hence.

Please make sure we have our ability to choose our software in the future.

Thank you

Jonathan Olas  
Cape Cod, MA

**From:** [bob frost](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Open document formats  
**Date:** Tuesday, July 17, 2007 7:06:57 PM  
**Attachments:**

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As an academic researcher in the IT and office work-process field, I've been following Massachusetts' efforts (and those of the EU) to define open, non-proprietary document formats closely. It has come to my attention that Microsoft is trying to pass off their highly proprietary document formats as "open." That is a fraud.

"Openness" means that there should be no software dependencies, that a format can be parsed by the software of the non-originating firm and correctly implemented. Microsoft will never do this. Witness what they did to Java—they claimed that they were standards-compliant in their implementation, but gosh—their "java" will only reliably run on their software.

Good government and good standards are in the end about transparency, and Microsoft is anything but transparent.

I care about this as an erstwhile historian, now an IT faculty member. When reading French documents from the 1920s all I needed was my eyes and a solid knowledge of French. With electronic documents, I don't want the researcher of 2107 having to find a computer that can load and run Office 200X in order to do history. With ODF, that will not be a problem.

I am writing you now because I deeply care about and admire your efforts. You are leaders in all of this, and future generations will be deeply indebted to you. Thank you immensely for your efforts and initiative.

---

Bob Frost, Associate Professor  
School of Information  
301-A West Hall  
University of Michigan  
Ann Arbor, Michigan 48109

1415 Dixboro Road  
Ann Arbor, Michigan 48105  
Skype: rfrost1

rfrost at umich.edu <http://www-personal.si.umich.edu/~rfrost/>

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How many infections does your computer have?  
virus, virii, viriii, viriv, virv, virvi, virvii... (there's no zero).

**From:** [kellerconsumer at comcast.net](mailto:kellerconsumer@comcast.net)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** open xml  
**Date:** Tuesday, July 17, 2007 6:59:26 PM  
**Attachments:**

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Dear sir or madame,

I support the use of .xml file extensions for public purposes.  
Robert S. Keller

**From:** [Marilyn G. Schroth](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** XML  
**Date:** Tuesday, July 17, 2007 6:58:16 PM  
**Attachments:**

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I support the inclusion of office open XML to the list of the acceptable file format

From: [Jinraj Joshipura](#)  
To: [Standards \(ITD\);](#)  
CC:  
Subject: Please allow open office XML  
Date: Tuesday, July 17, 2007 6:53:18 PM  
Attachments:

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Please allow open office XML



**From:** [Jason Woofenden](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [campaigns at fsf.org;](#)  
**Subject:** Open standards for public documents  
**Date:** Tuesday, July 17, 2007 6:35:40 PM  
**Attachments:** [signature.asc](#)

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Dear government officials,

As a Massachusetts resident and voter, I urge you to see the importance of storing, editing and publishing digital documents in open, freely usable file formats.

I heard recently that you were considering allowing use of Microsoft's "Open XML" format. This is NOT an open standard. Use of this format will force government employees and citizens to buy their expensive, untrustworthy, insecure, inflexible software. And some of us (like me) will not be able to open the documents at all, because Microsoft doesn't see a profit in supporting my kind of computer.

fsfeurope has put together a very thoughtful list of questions that must be answered (in the affirmative) before Microsoft's file format can be considered an open standard. Please consider each of them:

<http://fsfeurope.org/documents/msooxml-questions>

Thank you for your thoughtful consideration.

Best regards,

- Jason

---- PGP signature attached. See <http://jasonwoof.com/pgp.html> ----

**From:** [Harlan H Bloom](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Open Document Format  
**Date:** Tuesday, July 17, 2007 5:14:43 PM  
**Attachments:**

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Hello,

First let me say that I am gratified you are requesting comments from people, not only from your state.

I am for Open Document Format! I do NOT work on Microsoft operating systems or their products any more than I absolutely need to. I keep saying to people "I require an ACTUAL operating system, and one that actually works!" I use OpenOffice for word processing, spreadsheets, etc. When ODF became available for OpenOffice, I was ecstatic: We now have an actual DEFINED STANDARD! (Please keep this in mind.)

If you haven't already, please go to <http://www.groklaw.com> for TONS of information about ODF, OpenSource, and why Microsoft wants you in their pocket. MS-OOXML is nothing more than keeping YOU IN THEIR pocket, paying them money. They would also want you to believe that you can use converters; overall, this is just a bunch of crap!

If users of MS-OOXML make use of the Microsoft specific functions, they will find themselves locked into as much vendor and product-dependency as if no Open Standard or converter existed....

The only effective way for users of Microsoft Office to avoid that lock-in into a single-vendor dependency would be to save all their documents in the Open Document Format (ODF) by using the ODF plugin for Microsoft.

In other words: The only way to not be locked into MS-OOXML is to stay away from it. Because no matter what Microsoft and its business partners claim, the converters promote lock-in, they don't avoid it.

Again, Thank You for the opportunity to be heard. Please go to <http://www.groklaw.com> for far more information that I could ever try to convey in a simple email.

Have a Great Day!

Harlan...

**From:** [Ted Streete](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** MA adoption of ECMA 376 (Office Open XML) for document storage  
**Date:** Tuesday, July 17, 2007 4:51:34 PM  
**Attachments:**

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Dear Sir/Madam,

I fully applaud your goals of ensuring that documents are archived in a sufficiently well defined and standardized format to ensure that they continue to be readable in the future. ISO/IEC 26300 provides that assurance, and I understand that you are also considering ECMA 376 as an alternative.

Future versions of ECMA 376 may be an appropriate format for document storage, but the standard, as it is currently drafted, does not provide sufficient detail to ensure that your goal will be achieved. For example, section "2.15.3.6 autoSpaceLikeWord95 (Emulate Word 95 Full-Width Character Spacing)" defers the definition of the standard to the specific implementation of an application that is more than 10 years, and is no longer commercially available. It is therefore impossible for archivists to meet the terms of this section. Unfortunately, the ECMA 376 standard contains more than just this incomplete definition.

Additionally, while Microsoft, who drafted the ECMA 376 specification, have provided some language around licensing, there are still a number of questions around the rights that the Microsoft license provides. In particular there is no license to implementing any of the non-defined sections, such as section 2.15.3.6 discussed in the previous paragraph. Additionally, there is no clear license to creating documents to the ECMA 376 specification, only to consuming them.

In contrast, ISO/IEC 26300, provides a complete specification for document storage, unencumbered by patents of other intellectual property issues.

Please do not adopt the ECMA 376 specification as a standard until it provides a complete description for implementing all elements, and the license details have been clarified.

Thank you.

Jonathan Streete.

**From:** [Dennis Fairclough](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [lrotert at revonet.com;](mailto:lrotert@revonet.com)  
**Subject:** Open XML Standard  
**Date:** Tuesday, July 17, 2007 4:43:12 PM  
**Attachments:**

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Standards Committee for the State of Massachusetts,

Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Dennis A. Fairclough  
CEO  
Erudite Systems & Software, LLC.

**From:** [Sam Chilingurian](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Support for OpenXML  
**Date:** Tuesday, July 17, 2007 4:30:20 PM  
**Attachments:**

---

We have many projects based on OpenXML. Our developers love it and our clients benefit from it. We see a very bright future with this standard. Accepting Open XML standard will enable wider choice, which will allow for competition and innovation. Thank you

Sam Chilingurian  
nearData, Inc  
4502 Dyer Street #103  
La Crescenta, Ca 91214

818 415 2691  
www.neardata.com  
sam at neardata.com

**From:** [Rik Farrow](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [rik at usenix.org;](mailto:rik@usenix.org)  
**Subject:** OOXML in ETRM  
**Date:** Tuesday, July 17, 2007 3:17:29 PM  
**Attachments:**

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The OOXML, a proposed addition to the Massachusetts Enterprise Technical Model (ETRM), is not a real standard. OOXML is a statement of a proprietary, internal, and not publicly defined document format used only by Microsoft.

What makes OOXML particularly unsuitable as a public standard is that it 'defines' requirements in terms of Microsoft product uses. In other words, unless one has access to internal Microsoft documentation and source code, one cannot comply with this standard. For example, examine this section taken from the 6000 pages of the OOXML:

#### 2.15.3.6 autoSpaceLikeWord95 (Emulate Word 95 Full-Width Character Spacing)

This element specifies that applications shall emulate the behavior of a previously existing word processing application (Microsoft Word 95) when determining the spacing between full-width East Asian characters in a document's content.

How can any entity, outside of Microsoft, comply with this requirement? OOXML is not a standard, but a vendor specification, and the acceptance of OOXML as a standard is tantamount to the State telling its procurement offices to buy from a monopoly supplier and not on the open market.

Rik Farrow  
Editor of ;login:, the USENIX magazine  
<http://www.usenix.org/publications/login/>



**From:** [Sam Hiser](#)  
**To:** [Standards \(ITD\);](#)  
**CC:** [Sam Hiser;](#)  
**Subject:** Comment on ETRM 4.0  
**Date:** Tuesday, July 17, 2007 2:50:18 PM  
**Attachments:**

---

Dear Ms Pepoli-

I urge you to review and change the ETRM 4.0 policy from ODF + OOXML back to ODF-only.

It is morally and pragmatically detrimental to the citizens of The Commonwealth of Massachusetts (of which group I am now proudly a member) to have Microsoft's proprietary XML formats (which subsume the few benefits of XML in onerous lock-in mechanisms) included in the state's procurement policy.

It is my informed belief that accepting both formats will produce WORSE software constipation at all levels of use than we have ever experienced before.

While ODF is proving difficult to implement on a practical basis (and you & I know precisely how this is so), developments in the open standards field will in time stimulate a deployable solutions. (As you know, solutions have already been identified.) If The Commonwealth feels the frictions of deployment particularly acutely now it's because The Commonwealth was and remains first to challenge the issue. The ITD pilot alone will have saved other organizations millions, since they no longer need to repeat the work -- this is part of the progress we all make together.

Adhering firmly to the confidence of earlier convictions by changing back ETRM 4.0 to ODF-only will accelerate the changes necessary to make ODF the freely deployable solution to a workable XML document format future for the Commonwealth.

You can be assured that in this rapidly changing field of technology that your decision will influence many important decisions by your counterparts across the nation and the world which will reinforce a decision in this case based upon moral

& practical principles.

Sincerely,

Sam Hiser  
31 Music St.  
West Tisbury MA 02575

**From:** [Ivan F. Villanueva B.](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** ooxml  
**Date:** Tuesday, July 17, 2007 1:53:26 PM  
**Attachments:**

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Regarding the use of the Microsoft format OOXML, please consider the facts explained in

<http://www.nooboxml.org/1900>  
<http://www.nooboxml.org/muslims>  
<http://www.nooboxml.org/patents>  
<http://www.nooboxml.org/global-relevance>  
<http://www.nooboxml.org/user-needs>  
<http://www.nooboxml.org/what-is-an-open-standard>  
<http://www.nooboxml.org/conversion>  
<http://www.nooboxml.org/rice-pudding>

--

Iván F. Villanueva B.

A.I. Open Source project: -- [www.artificialidea.com](http://www.artificialidea.com)  
FFII.org Deutschland -- [de.ffii.org](http://de.ffii.org)  
FFII.org España -- [es.ffii.org](http://es.ffii.org)  
FFII.org Enterprises -- [www.economic-majority.com](http://www.economic-majority.com)  
FFII.org No Software Patents -- [www.nosoftwarepatents.com](http://www.nosoftwarepatents.com)

**From:** [L. Mark Stone](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** Comments Regarding Microsoft's OfficeOpen XML Specification  
**Date:** Tuesday, July 17, 2007 1:52:16 PM  
**Attachments:**

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I appreciate the diligence Massachusetts is using in considering adding Microsoft's OfficeOpen XML specification (Ecma 376) to the list of usable "open standards" and thought it would be helpful to provide some "notes from the field."

Prior to forming our managed services technology company more than four years ago, I was the CIO for a global corporate trading company in Manhattan with 19 offices in 16 countries and which directed some \$1.2 billion in corporate procurement spend. Prior to that, I was a partner in two investment banking firms where I specialized in technology and media mergers and acquisitions.

In our current company, we try to use ITIL-based standards to provide high quality technology consulting and managed services to clients who understand the true cost of downtime. The bulk of our work comprises documenting systems and systems designs; and providing maintenance, monitoring and other managed services for Windows, Linux and Mac platforms. We wind up exchanging a lot of documents with clients, prospects, hardware and software vendors, and internally.

We have settled on Acrobat as the primary exchange format for finished documents because all of the parties with whom we exchange documents are able to read and print the documents consistently, regardless of the platform on which the document is being viewed, and also regardless of the tool being used to render the document.

But when we need to create documents collaboratively, we use OpenOffice. We do so because we can edit OpenOffice documents on any mix of platforms, and the documents render identically on any platform--regardless of on which platform the edits were made or on which platform the document is being viewed.

That our cross-platform document collaboration work has become so wonderfully boring and predictable I believe is due primarily to OpenOffice's use of a document format that has survived ISO's and the IEC's rigorous standards approval and certification process.

As I understand it, the majority of Ecma's Standards are subsequently sheperded by Ecma through ISO certification. In practice, ISO certification has resulted in solid, open standards that are customarily broadly adopted, such as the ISO 9660 CDROM standard, which originally was an Ecma Standard.

The ISO 9660 standard has grown to become the defacto standard for CDROM file systems--simplifying cross-platform data exchange on CDROMs for millions while at the same time substantially lowering the costs for CDROM drives.

ISO certification of Microsoft's OfficeOpen XML document format would provide similar benefits to the citizens of Massachusetts, which is why I would encourage Massachusetts not to add Microsoft's OfficeOpen XML document format to its list of usable "open standards" until Microsoft's OfficeOpen XML document format has gone through the same rigorous review by ISO that Ecma's CDROM volume and file structure Standard went through, when it subsequently became ISO 9660.

Thank you for consideration.

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A Message From... L. Mark Stone

Reliable Networks of Maine, LLC

"Uptime. All the time."

477 Congress Street

Portland, ME 04101

Tel: (207) 772-5678

Web: <http://www.reliablenetworks.com>

This email was sent from Reliable Networks of Maine LLC.  
It may contain information that is privileged and confidential.  
If you suspect that you were not intended to receive it, please  
delete it and notify us as soon as possible. Thank you.

**From:** [Melanie Wyne](#)  
**To:** [Standards \(ITD\);](#)  
**CC:**  
**Subject:** FW: CAn you pdf this please?  
**Date:** Tuesday, July 17, 2007 1:45:15 PM  
**Attachments:** [MA Policy Comments ETRM v4 0 07 07.pdf](#)

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Attached please find the comments of the Initiative for Software Choice on the ETRMv.4.0.

~~~~~  
Melanie Wyne
Director, Public Policy
CompTIA
Executive Director
Initiative for Software Choice

Ph: 202-543-3003 x202
Fax: 202-543-3008

From: [Bedros Hanounik](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OOXML
Date: Tuesday, July 17, 2007 1:35:46 PM
Attachments:

please reconsider your position on OOXML.

OOXML is not a real open specifications. Microsoft left so many features inside OOXML not defined in the details (so no one can build a complete product purely based on reading the OOXML specs). Which does not make it a complete specification (intentionally)

on the other hand, ODF is created by group of companies and members; There are many implementations of the standard (openoffice, Koffice, IBM web sphere...etc) and not controlled by a single entity.

where as OOXML is created by a single entity (Microsoft), implemented by a single product (MS office 2007), and controlled by a single entity Microsoft.

imagine what would happen if there's only one gas company. You'll be paying at least \$10 per gallon.

please allow the only true open standard specification for office documents which is open-document-format. and disregard all "fake" open standards such as OOXML

Regards,

Bedros Hanounik

From: [Aaron \[TechPeople\]](#)
To: [Standards \(ITD\);](#)
CC: ["Lola Rotert";](#)
Subject: OpenXML
Date: Tuesday, July 17, 2007 1:23:53 PM
Attachments:

I would like to bring to your notice the following:

1. As an international open standard of Ecma International, Open XML meets all state requirements as an open standard. Use of the format will help enable citizens and state agencies to access electronic files well into the future.
2. There is significant support for Open XML in the marketplace today as shown by the support in [openxmlcommunity.org](#) and [openxmldeveloper.org](#), and many independent developers and their customers are benefiting from this new technology.
3. Technology policies should enable government agencies to choose from technologies and products that meet their needs.

Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Regards,

Aaron Roy
TechPeople, Inc. CI SV, HUB
512/989-5959 x 203
512/610-5900 Fax
512/779-6128 Cel
aaron@techpeople.us

IBM Business Solutions Partner
Microsoft Partner
Lenovo Business Partner

A Certified MBE Company

From: [Eric Gonczeruk](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OOXML and ODF
Date: Tuesday, July 17, 2007 12:29:40 PM
Attachments:

This will be short and to the point.

I strongly believe that government documents should be distributed in a TRULY open and accessible format such as ODF.

"OOXML uses very little of the consolidated best practices of the industry. Worse, would-be implementors of OOXML would have to use proprietary, legacy formats used by Microsoft, and only them, even when relevant W3C standards are available. OOXML is not aspirational." (<http://www.odfalliance.org/resources/The%20Technical%20Case%20Against%20OOXML.pdf>)

OOXML has only been implemented in Microsoft Office. Citizens should not have to pay a Microsoft tax to read government documents.

Eric

From: [Eric Rodriguez](#)
To: [Standards \(ITD\);](#)
CC: [Kelly Rodriguez;](#)
Subject: Open XML debate in Massachusetts
Date: Tuesday, July 17, 2007 11:35:54 AM
Attachments:

Standards Committee,

As a systems integrator company, we are challenged constantly with compatibility issues. Open XML file format specification maximizes interoperability in a heterogeneous environment. Open XML is compact and robust file format that enables compatible data integration between documents, applications and back-end systems. Open XML is open source, royalty-free file format that allows any technology provider to integrate documents into their solutions. Driven Technologies, LLC highly encourages this committee to allow usage of Ecma 376 – OpenXML file formats.

Regards,

Eric Rodriguez
Chief Technology Officer
Driven Technologies, LLC

From: [jose lorenzo](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Comments on OOXML and related issues
Date: Tuesday, July 17, 2007 11:21:32 AM
Attachments:

To whom it may concern:

I wish to try and explain views I have on Microsoft and on standards like ODF and "standards" like OOXML. First I'll say some things about Microsoft because they are playing a significant role here. Without their financial backing, there would be almost no support for OOXML. We have to wonder why a standard would be so important to a single major player and shun by the open source community at large and by the majority of their competitors in the industry [major players like IBM, Sun Microsystems, Oracle, and others]. The perspective from which I will try to make my sale is that of the end user that like myself sees value in truly open standards as a way to gain an upper hand on your vendor. I care not for any company's stock price or that any particular open source project succeed over another.

My view is that Microsoft is not trustworthy. In the past Microsoft has many times adopted a standard in order to win business and on its way to developing a controlling market share has tinkered with its supposed implementation of the standard so that files cannot transfer faithfully to competitors' products. The end result is that many customers find it difficult and costly to migrate away and instead stay with the Microsoft product even as the price increases significantly. Additionally, Microsoft has broken compatibility with its older products making it so that old files ultimately do not transfer faithfully. In anticipation of this (and as Microsoft warns that it will stop supporting the older products) customers continue to pay licensing fees with regularity for the newest versions of Microsoft products even if they are otherwise happy with what they currently have and do not otherwise wish to migrate. There are many reasons

not to want to migrate at the pace Microsoft has determined is in its best interests. Microsoft is not the only vendor that does this, but they are arguably the most aggressive doing this and have an established monopoly in general office suite software (partly because of just these reasons).

Microsoft (just like many other vendors) considers creating constant incompatibilities to be a legitimate and intelligent business decision. They won't always say so, yet when they do provide a little bit of interoperability with others (especially after customers threaten to drop their products), Microsoft consider that it is them that is making the sacrifice. The fact is that Microsoft makes money only when customers pay it instead of competitors. Microsoft makes money regularly only when customers pay them regularly. Not all companies seek to force upgrades but some do, and when you already have under control a large percentage of the market, there is not a lot of new business Microsoft can gain to offset any losses. The result tends to be steady price increases which are actually very successful because of the lack of competition for Microsoft's proprietary file formats. Similarly, when you already have a product with an abundance of features, it is not that likely that much value can be added to the product. Changing the file formats and dropping support for older versions provides a very successful method to get the customers to buy new licenses when they otherwise wouldn't.

It should be clear how important it is then to use products that provide file formats that competitors can understand. If competitors can understand them, then the option to migrate to a competing product is available and not that costly; thus, you can see why many vendors would try to have their products be able to read the formats of competitors but produce native files that others cannot read accurately. This helps ensure that the customer cannot migrate away easily, so it is up to the customer to actively take steps to combat this typical tendency by most commercial vendors to use lock-in techniques. Now, having competitors at some point in time be able to read proprietary file formats is not enough, as competitors might be in a licensing arrangement with the format controlling vendor. Just like the original vendor can drop support for formats over time in favor of newer

versions, so too will the competitors be forced to drop support. This will either be stipulated explicitly in the partner licensing arrangements or these licenses (or even other unrelated but conditioned business transactions) will increase in cost to the point to make it uneconomical for the competitors to support older file formats. Understand that a proprietary format can also be any format that appears to implement an open standard but breaks with it in significant ways which the vendor keeps secret or for which partner licenses are required.

And so we get to truly open standards. The guiding test behind an open standard is will I be able to find multiple vendors that will be able to easily support this format many years from now? As a quick example, the ODF file format is supported by several open source office suites. These products, by nature of being open source, give you a license to use and even to modify the product with no time limit. In this way, you can always use such a product to open older files, and further, should extra support be desired, the open source nature of these products means that a huge number of individuals and businesses will be able to support the product by accessing the source code at any point in time [the source code is like a completely specified blueprint of the product in one or more computer languages]. Now, these open source products do a decent job of understanding Microsoft's proprietary formats, but they are not going to do a perfect job because they are not following an open standard but are reverse engineering the format through lots of patience and work over many years. Some secrets just won't be discoverable. Could you start to see that open source developers don't like proprietary standards? They waste a lot of time trying to figure out what they would know if the formats were open. So while a company like Microsoft has an interest in keeping the competition slowly working their way through obstacles, the end consumer doesn't benefit because then advancement is determined by one vendor (the one with control) and not by a competitive marketplace. As a general rule, commercial vendors like to use lock-in techniques, whether or not they claim to follow open standards, while the open source players don't even have the option to use real lock-in techniques. The latter's vote was cast the minute they decided to go open source. Thus, with open source

people being the industry competitor most on the side of the end user (their model wouldn't even work otherwise), special consideration should be given to the formats that this group considers to be truly implementable as open source by the general community. Open source projects serve as a product of last resort and as a proof-of-concept for any standards that is able to claim to be truly open. ODF is succeeding here. OOXML is failing that test.

Is OOXML open then? No, not in the sense I mentioned above. Four (more) violations come to mind. One, Microsoft has significant control over the evolution of that standard. Thus, at best, the competition cannot get ahead of Microsoft as Microsoft can turn the tables on them so that they no longer satisfy the standard. In practice, Microsoft will only evolve the standard when they have managed the time to implement the changes they will be incorporating into the standard. We are thus back to the case where the industry advances only as fast as Microsoft is able or willing to advance itself. The other problem is that others' terrific ideas will not go into the standard unless Microsoft so wishes. In practice, Microsoft will incorporate a variation of any good ideas into a revision of the standard if and when they have that idea already implemented. This maximizes their advantage, and remember, your vendor's advantage is your disadvantage.

Two, OOXML has aspects that are completely unspecified in the standard. Thus it is not an open standard period.

Three, Microsoft does not yield all patent claims to implementations of the standard except under very strict and effectively useless conditions for the creation of a last-resort open source implementation. This is my understanding, but not being a lawyer, I won't go much further.

Four, OOXML bypasses a large number of already existing open standards in favor of creating its own overlapping mega standard. While ODF reuses many standards that the industry already understands and which original failures have been discovered and fixed over the years to a large extent, OOXML brings out a very large standard all at once that duplicates

existing ones. Engineers know that if you take too large a bite out of an apple you should expect many problems for some time to come. As OOXML was rushed (compared to ODF development in the open) and is so large, there are bound to be many mistakes. Assuming there was any competitor crazy enough to try and implement OOXML (short of being funded by Microsoft, which likely means independence doesn't really exist), the competitor would likely find many irreconcilable scenarios and cases where their interpretation does not match those of Microsoft. So OOXML likely has flaws that will take time to be ironed out (with ODF already being much more mature as a well-specified open standard), and due to its size and failure to reuse many common industry standards, it is unlikely to be taken up by competitors, especially with a working, familiar, and ISO standard already existing (ODF).

The following web page covers these and other faults with OOXML in more detail:

http://www.grokdoc.net/index.php/EOOXML_objections

I believe most of the following comments express objections to OOXML becoming an ISO standard:
<http://www.incits.org/DIS29500/DIS29500.htm> Regardless of how many are for and how many are against, all such submissions can be helpful.

A further link gives an idea that receiving the approval of a standards' organization is a function of factors beyond simply the quality of the standard. In particular, one should consider carefully the implications of anomalies like the example described about the large increase in membership at the last minute, most such new members voting as a block.
<http://www.consortiuminfo.org/standardsblog/article.php?story=20070715200544734>

Returning to Microsoft one more time, consider that Microsoft was a member of ODF. I am curious if Microsoft did anything but to borrow ODF ideas in order to create its own OOXML that it could control and leverage against the industry. Should not Microsoft have contributed to ODF? One should wonder why. The reason has probably already been stated. Microsoft has never in its long history been willing to play by standards. That's not my invention. That is history and the company accepts that as the smart

business decision for themselves. This play isn't in the customer's best interest, however, any more than it is in the customer's best interest to pay time and time again (Microsoft benefits, customer doesn't). Absent a level playing field, no vendor should be trusted. Microsoft will not negotiate if possible, especially with them having so much to lose in market share over to its competitors, especially with good free alternatives available that if these could actually implement the MS Office standard, Microsoft would be forced to compete by lowering their prices significantly.

The ultimate question is why even bother with open standards or a competitive marketplace? If there are reasons for this, OOXML is a bad choice. It *may* become a better choice than it is now at some point in the future, but now it is a horrible choice that is not close to passing the open and fair tests.

A final consideration is that the value of using standards that are open in actuality (and not just in name: that was a neat trick by Microsoft calling it OOXML) is very important for a government because we aren't just talking about internal usage. There will necessarily be spill over to published documents. The citizen should be able to interact with their government with as little outside requirements as possible. ODF is implemented in software through multiple products that are each available to anyone under basically no usage restrictions and for no charge. OOXML is nowhere in that radar.

I did attend school in Massachusetts and so resided in the state for several years in the 1990s. I have always appreciated that Massachusetts did not back down from the antitrust violations of Microsoft when other states and the federal government did. This really helps the many students living in there, regardless of whether they continue to reside in the state afterwards or not. I am sure many others besides students also benefit.

I apologize if I appear to ramble on and on, but I decided to add one more section to this letter to consider arguments that might speak in favor of buying products with proprietary formats from Microsoft. The claim alleged is that Microsoft needs incentives to

build innovation into their products. If everything has to be in the open, what incentive is there? Alternatively, Microsoft will add innovation into their products only if they can keep the recipes secret.

This sounds fair. The end user may even benefit more if they don't insist Microsoft be transparent. Right? Well, I don't think so, not in general. The problem is to think that innovation can only occur from Microsoft. Just two examples of innovation happening away from and prior to Microsoft in this area of technology are Corel Word Perfect and Lotus spreadsheet products. Microsoft was able to feed upon these works to grow its then competing product. [Potentially, Microsoft monopolized this area through illegal tie-ins with the closed proprietary Windows platform monopoly. This is noteworthy to mention because proprietary secrets already were working to help Windows remain a monopoly. This same technique reused in MS Office simply reinforced the old and newly established monopolies.] Clearly there are a great many brilliant and prolific developers that have never place foot inside Microsoft. Open formats is a recognition that the most innovations happens in unexpected places at unexpected times and these should all be usable to maximize the benefits to the end user. We would like all of that innovation to be used to drive the competition forward. With proprietary formats, there is no true interoperability (as stated throughout this letter) so much innovation doesn't even come about or comes about but the product is not used because it cannot be a drop-in replacement for MS Office and so dies on the vine (and with it future innovations from that same group). Don't these other innovators also require incentives just as Microsoft claims it does? Just two examples of innovation slowing significantly because of an inability to seamlessly integrate with the controlling proprietary formats are Corel Word Perfect and Lotus spreadsheet after Microsoft established their monopoly.

Naturally everyone can't have their own incompatible proprietary formats as Microsoft claims is a necessary incentive. The question then becomes, do we favor one innovator over all the others and in that process limit almost all the innovation to that one vendor? Will this really result in getting the most amount of

innovation from the entire industry? I think not. As proof, we have that there exists a competing, growing, and improving list of products that inter operates ever since ODF came into existence. Apparently incentives exist because the products keep improving in unexpected ways. A second example is that prior to ODF and Openoffice (a major open source implementation of ODF), there had been no real competition to MS Office for years. While MS Office continued to grow, that growth has been at a much slower pace than today with ODF and open source allowing for a competitive landscape. So which taps the most innovation potential, the case of the controlling proprietary standard providing incentives for one player only or the case of a truly open standard providing at least some realistic opportunity for anyone?

A separate example that may be helpful is to consider the field of Internet browsers. Firefox and Mozilla are a result of open source and adherence to open standards. Internet Explorer controlled that market and languished for years without developing very much that was new. It was only because of open Internet web standards in use (see W3C) and the growth of open source (demonstrated through Firefox, Mozilla, and others) that now Internet Explorer once again has a competitor off of which it can feed and grow.

In short, Microsoft excuses and attempts to create an "open" standard it controls should be recognized for what they are. The end user needs to fight so that the vendor will be kept partially honest, as this honesty won't happen voluntarily because these two sides are inherently at odds (only one can have the money). We also shouldn't take open source products for granted. Multiple interoperable open source products that are available to all with virtually no restrictions indicates that a good open standard exists which can support a healthy commercial industry and that citizens have freely available unrestricted options of last resort to interact with their government.

Sincerely,
Jose Lorenzo, Miami, FL

Take the Internet to Go: Yahoo!Go puts the Internet in your pocket: mail, news, photos & more.
<http://mobile.yahoo.com/go?refer=1GNXIC>

From: [John Sheehan](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OpenXML Format
Date: Tuesday, July 17, 2007 11:00:56 AM
Attachments:

I believe that government agencies should be able to use the OpenXML format, if they so choose. As a developer, it would be advantageous to be able to have OpenXML as a choice if I working on a government contract. It has some great features that would make building collaborative solutions on top of it, while still allowing compatibility with standard word processing systems.

Thank you for your time,

--

John Sheehan

From: [Eric Jahn](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please adopt ODF and not OOXML
Date: Tuesday, July 17, 2007 10:34:11 AM
Attachments: [signature.asc](#)

I conduct business with many individuals in Massachusetts, and am very concerned that your state is considering standardizing upon anything other than the Open Document Format (ODF) for office documents. Adopting a OOXML from Microsoft could have serious damaging long-term impacts to worker productivity and IT infrastructure choices available, thereby lower competitiveness. Please support ODF and do not bow to the short-term pressure from Microsoft.

--

Eric Jahn
Alexandria Consulting LLC
3126 8th Ave. N
St. Petersburg, FL 33713
941.321.1466

From: [Jeff.Clark at lindy-usa.com](mailto:Jeff.Clark@lindy-usa.com)
To: [Standards \(ITD\);](#)
CC:
Subject:
Date: Tuesday, July 17, 2007 9:48:08 AM
Attachments:

3-Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

Jeff Clark
LINDY Computer Connection Technology, Inc.
14327 Bledsoe Road
Athens, AL 35613
Phone# (256) 771-0660
Fax# (256) 771-0460
toll free# (888) - 865-4639
<http://www.lindy.com>

From: [Pringle, Simone \(ITD\)](#)
To: [Standards \(ITD\)](#);
CC:
Subject: FW: ETRM 4.0
Date: Tuesday, July 17, 2007 9:29:50 AM
Attachments:

Simone L. Pringle
Enterprise Architect
Information Technology Division
Commonwealth of Massachusetts

www.mass.gov/itd

From: Slater, James (EPS)
Sent: Monday, July 16, 2007 3:29 PM
To: Pringle, Simone (ITD)
Subject: ETRM 4.0

Hi, Simone!

The only comment I have on this latest version concerns the last paragraph in the "Related Trends" section (p.2) of the Application Domain. Specifically, the META projections listed here are irrelevant given that we are already half way through 2007.

Also, I think it would help tremendously to number the sections and subsections.

Jim Slater
CO
Executive Office of Public Safety

From: [Greg Rundlett](#)
To: [Standards \(ITD\);](#)
CC: [GNHLUG; BLU;](#)
Subject: Public Comment on ETRM Draft 4.0
Date: Tuesday, July 17, 2007 8:04:43 AM
Attachments:

Information Technology Division
Commonwealth of Massachusetts
Attention: Beth Ann Pepoli

Re: Public Comment on ETRM Draft 4.0

Dear Ms. Pepoli:

In the interest of full disclosure, I am the Manager of Technology Services for OASIS. However, the comments below are rendered solely in my individual capacity as a resident of Massachusetts and as a proponent of open standards, and have not been requested, reviewed or approved by OASIS, the Open Office community, or by any other parties.

In 1992 I was an investment broker for (then) Dean Witter in Wellesley, MA. It was the leading branch outside of Boston. Aside from managing millions of dollars in investments for my clients, I was also the volunteer branch technology coordinator - helping Dean Witter brokers leverage technology to enable their businesses. For example, I created a monthly newsletter to educate and build relationships with my clients and the investment public. The software that I used to create my newsletter was Microsoft Publisher v1.0. I was proudly doing 'desktop publishing' including a nice layout and design elements.

Time went by, and about 3 years later I bought a brand new computer. I purchased some software to go with the computer, and was excited to get the newest version 2 of Microsoft Publisher. I was curious to see how many improvements had been made in the area of desktop publishing. To my complete dismay, the new version of Microsoft Publisher would not open the files produced by the earlier

version of Microsoft Publisher. In fact there was /no available software/ to read these files. The only software to read these files was the original program - which by now was not installed on any operating computer that I owned - nor was it available for purchase. Being stored in a binary file format, I could not even use tools to extract the plain text portion of the newsletters. My documents, and the history they embodied have been locked away ever since.

That was how I learned how file formats - especially binary ones - could completely own the data that you thought was yours. I still have those newsletters on floppy disk. I would gladly send them, paying all the costs including return postage, to anyone who can transcode them to an open, implemented, standard file format like ODF. If you put them into OOXML then I will not have any software that can read them.

If Microsoft has a terrible track record of providing compatibility for it's own customers with it's own products, then what possible confidence can we have that OOXML will be an open standard offering compatibility with other vendor products and other file formats?

I am extremely proud of the initiative and brilliant policy set by the ITD in recognizing the benefit of open standards in file formats. The ITRM set out in 2005 put Massachusetts on the map globally in both technology and government. The ODF file format is the foundation for good information stewardship and providing low-cost, open, effective government.

I see none of those same merits, benefits or characteristics in OOXML. It is telling that Microsoft uses the name 'Office Open' and the word 'XML' in order to confuse the marketplace and disguise their intentions. I am certain that if the ITD places OOXML on the same level as ODF it will be a costly mistake. Massachusetts and all her taxpayers will surely suffer consequences.

Let's keep moving forward with the true and open standard of ODF. This way the Commonwealth will indeed be a wealth of the commons.

Gregory Rundlett
Newburyport, MA

Manager, Technology Services
OASIS

Billerica, MA

From: [Michael Brown](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ETRM Open Format proposal - ECMA-376 (OOXML)
Date: Tuesday, July 17, 2007 7:51:24 AM
Attachments:

Dear Sirs,

I am concerned by the proposal to incorporate the ECMA-376 document format (OOXML) as an "open format" in the Enterprise Technical Reference Model. I am a professional software developer, and I am familiar with the process of reading and implementing standards documents. ECMA-376 falls short in many key areas, and the end result is that it can never be fully implemented by anyone other than Microsoft. This disqualifies it as an "open format" under any reasonable definition of "open".

As a specific, concrete example (which you are probably already familiar with), ECMA-376 section 2.15.3.32 requires that an implementation shall be able to "emulate the behaviour of...Microsoft Word 5.x for the Macintosh...when the smallCaps element" is used. No further explanation is provided; only a party with access to the source code for Microsoft Word 5.x for the Macintosh (i.e. only Microsoft itself) can ever implement this part of ECMA-376. This is far from being an isolated example; ECMA-376 is littered with such examples.

I urge the Information Technology Decision to remove ECMA-376 from the ETRM, and to retain the ISO Open Document Format (ODF).

Michael Brown MA (Hons) (Cantab) MEng MIEE
Managing Director, Fen Systems

From: [steve tree](#)
To: [Standards \(ITD\); campaigns at fsf.org;](#)
CC:
Subject: Open Document Format
Date: Tuesday, July 17, 2007 5:59:55 AM
Attachments:

Please impliment Open Document Format. Thank you. Steve Tree

From: [john at ev6.net](mailto:john@ev6.net)
To: [Standards \(ITD\)](#);
CC:
Subject: Comments on the acceptance of Microsoft OOXML format as a standard
Date: Tuesday, July 17, 2007 5:34:17 AM
Attachments:

Hi,

I do not believe that Microsoft OOXML format should be approved for state use for several reasons.

Firstly, there is already a perfectly good format (OpenDocument) which is already approved for the same kind of uses, it makes no sense to support numerous formats as this will only increase workload and complexity, as well as confusing users. I do not believe the Microsoft OOXML format provides any advantages over the OpenDocument format, however it has a significant number of disadvantages.

The OpenDocument format is controlled by a committee of several organisations, whereas the Microsoft format is controlled by a single company. It may also make sense for the State, as an interested party, to join the OpenDocument committee at Oasis.

Also, Microsoft were invited to join this committee very early on and refused, they could have helped to shape the ODF format. Instead, they chose to create their own incompatible format.

Finally, and probably most importantly, Microsoft OOXML is not a truly open format. It has many areas where it provides incomplete information, thus making it difficult for third parties to implement it. Some examples include the formula specification for spreadsheets, where some of the functions fail to specify the unit of measurements they will use. Also there are references within the format to old proprietary applications. These references state that formatting should be done in the same way as these old applications did, but provide no clue as to how exactly. The only way to find out, is to reverse engineer these older programs. The requirement to reverse engineer a proprietary program has no

place in a supposedly open standard, and the use of proprietary undocumented information like this renders the OOXML format no better than the proprietary binary formats it is supposed to replace.

So, i urge the state not to support the Microsoft format, and to continue supporting the OpenDocument and PDF formats.

From: [Rob van Son](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Public Comment on ETRM Draft 4.0
Date: Tuesday, July 17, 2007 5:19:37 AM
Attachments:

-----BEGIN PGP SIGNED MESSAGE-----

Hash: SHA1

Information Technology Division
Commonwealth of Massachusetts
Attention: Beth Ann Pepoli

Re: Public Comment on ETRM Draft 4.0

Dear Ms. Pepoli:

Since 2005 I have followed the development of ODF and Ecma376 (OOXML) as an interested consumer. I found the publications and public hearings, eg, with Secretary of Administration and Finance Eric Kriss and CIO Peter Quinn very illuminating. Especially the parts about "future proving" documents for access exchange and beyond the lifetime of specific applications and vendors resonated with my own feelings. I have experienced my share of lost documents and data. Planning new experiments now inevitably involves finding the right, future proof, formats for storing recordings, annotations, and descriptive documents.

Although I am not a citizen of Massachusetts, not even of the USA, I have followed the hearings and evolution of the policy proposals regarding document formats in your state with interest. After your request for comments on the ETRM Draft, it appeared to me that you might also be interested in the personal opinion of other consumers like me. I would be delighted if I could be of assistance, however slight my contribution would be, to reach an informed decision on what policy is best for the people and Commonwealth of Massachusetts.

To put my letter in perspective, I am a university researcher from the Netherlands with no connection to document format development or

standardization efforts, past or present. I have no connection with any of the commercial and non-commercial entities involved in ODF or OOXML standardization or use. However, I am a happy user of OpenOffice.org and various GNU/Linux distributions. I also use various versions of Microsoft Office. I must admit that I have seriously doubted the value of OOXML as an international standard right from the public hearings in Massachusetts in 2005. The subsequent history of the standardization efforts of OOXML have increased, rather than reduced, my reservations.

As I feel not qualified to discuss the technical details of the formats, I will concentrate on my perspective as a user of document processing applications. As ODF has been fully supported by the Massachusetts document policy from the start, I will concentrate on the addition of the Ecma 376/OOXML standard to the list of accepted "open" document standards.

- From the start, the representatives of Massachusetts stressed the importance of sovereignty and future access and exchange of documents. I have severe worries about both these policy aspects if the proposed OOXML standard is used.

In the remainder of this letter, I would like to explain to you my views on the adequacy of OOXML as an open document standard and for document preservation. I will try to concentrate on matters I believe might be important to the ITD policy decisions of Massachusetts, ie, long term preservation of documents (future proving), standards stewardship, licensing, choice of applications, and finally, economic considerations of using "competing" standards. On the whole, I feel that the current formulation of OOXML does not fit the requirements of a modern, responsible society and administration on any of these points.

- - Future proving

Future access and exchange of documents requires that a user after some decades (or more) will be able to open and process documents without access to the original computer platform and application that created the document. The question is, can it be assumed that such a future user can understand and process or convert the document with only the published documentation?

With standards like PDF, ODF, and (X)HTML, I do not worry much. These standards are all well documented and documents are human readable after

some basic operations. Even binary audio and graphics formats are regular and well documented enough to not pose insurmountable problems.

However, I do worry if the designer of OOXML, Microsoft, themselves advocate including proprietary, undocumented extensions to OOXML in documents. As Microsoft's representatives did during the Discussions in BIS of the WordProcessingML Sub Committee Meeting of LITD15 (<http://odfalliance.in/OOXML.html>) in their their comments on the Paper “Why ECMA OOXML cannot be regarded as a free/open document standard?” by Dr. Nagarjun G.

(<http://www.odfalliance.in/files/Comments%20on%20Paper%20by%20Dr.%20NagarjunaG.pdf>).

[Developers find custom schema support exciting and useful, because it means they can embed their own schemas in documents and thereby bridge the worlds of documents and data. This is by far the most popular topic in the developer workshops we deliver, so our experience doesn't support the statement that the need for this capability is "nil."]

The fact that developers and companies like proprietary and possibly undocumented "custom schema" extensions does not mean that these are liked by, or advantageous for, users who want to ensure future access to their documents.

Furthermore, Microsoft also stress, I feel they even advocate, the ability to include binary objects and undocumented macro code into OOXML documents. As they express in the same document:

[Regarding the lack of description of “OLE, macros/scripts, while the level of documentation is not an issue of contradiction, it is important to point out that implementing OpenXML places no requirements on support for proprietary technologies. Macros, encryption are not used in the OpenXML specification, and therefore no further documentation is necessary for full compliance.

OLE is referenced within the OpenXML specification, but as an example method for embedding objects from external applications. There is no requirement that OLE be used as the technology for such embedding. This is similar to the ODF standard (§9.3.3) where the <draw:object-ole> element is defined.

The most prevalent example of capability supported in Office but not

Ecma 376 is the use of Macros. Macro-enabled formats (.docm, .dotm, .xlsm, .pptm, etc.) are not part of the submission to Ecma international and ISO for standardization. This would also include Excel Macros (XLM).]

The fact that all these specifications are undocumented and not part of the OOXML standard specification means that users are unable to ensure the future access to their documents. The fact that the ODF standard needed to include OLE objects is a case in point. As I understand it, OLE objects are implemented in undocumented, proprietary, formats developed by Microsoft. I think it is questionable to expect that anyone outside Microsoft can decode them faithfully. I see their inclusion in the ODF standard as a way to allow users of Microsoft Office formats to convert their legacy documents to ODF as good as possible. However, I do not see the ODF designers advocating the use of OLE elements in ODF documents, on the contrary. The inclusion of OLE objects in a document could make future access to documents virtually a prerogative of Microsoft.

There is the other question of whether OOXML is mature enough to be used as a standard for documents that have to remain accessible for decades. All standards need to evolve because of shortcomings or defects and new needs. I would always want to know whether documents produced in the earlier versions of the standard can be "upgraded". With regular XSL (Extensible Stylesheet Language) compatible XML documents, it is always possible to write a style sheet converter from one XML language to another with minimal loss of information. So it must be possible to "upgrade" any document to another version with the minimum of loss of fidelity.

The simple fact that OOXML is not compatible with XSL is therefore a cause of worry. It is not guaranteed that OOXML documents can always be converted automatically. The worrisome fact is that even Microsoft Office 2007, the most complete implementation of OOXML relies heavily on deprecated features, eg, VML instead of the official DrawingML, and even advises users to save spreadsheets not in OOXML but in a binary format. If even Microsoft has to revert to older, possibly non-open, formats, I do not feel confident that I can really depend on my documents being accessible to future, pure OOXML, applications. And I think this concern will be even more pressing to a user like Massachusetts.

In summary, I see, contrary to Microsoft, the inclusion of undocumented, proprietary, extensions of custom schema's and binary objects as

defeating the purpose of a "future proof" document standard. Furthermore, there are many technical aspects of OOXML that make me feel uncertain about the ability to "upgrade" or convert current documents to future versions of "pure" OOXML, without all the deprecated and undocumented features of the current definition.

-- Open stewardship

In the 2005 hearings, there were several remarks on the need for open stewardship of any standard. I am not quite up to date with the latest plans for OOXML after possible ISO acceptance. However, up to the submission of Ecma 376, all development of this standard has occurred behind closed doors. Even Microsoft characterized the input of the the Ecma376 technical committee as "requests" which they seem to have been free to grant or not. The charter of the Ecma 376 technical committee was essentially limited to "standardize the document format of Microsoft Office 2007 as presented by Microsoft". So the history of OOXML does not give us any cue about how a future "open stewardship" would look like. Will it really be open for all stakeholders? Will it be open to representatives of Massachusetts?

This question matters to Massachusetts as it might feel the need to influence the evolution of OOXML. That is, can Massachusetts send representatives to the body that controls OOXML and have a real influence on its decisions. For example, Massachusetts has a recorded history that starts before 1900, so it might feel that spreadsheet dates should not be restricted to "1900 and later", as is now the case in OOXML. Administrative bodies from Massachusetts might want to influence accessibility features of OOXML, correct errors in spreadsheet functions, or remove support for deprecated features, like VML. Massachusetts might want to know beforehand whether they will have a real say in the decision to remove, add, or change any aspect of OOXML.

Next to any legal influence on the controlling body, there is the question of practical influence. Currently, there is only a single, more or less complete, document processing application that can handle OOXML, MS Office 2007. There is a very real possibility that this package, with a near market monopoly, will refuse to follow changes in the OOXML standard that do not align with the commercial interests of Microsoft. That this fear is not imaginary can be concluded from a report on the Open Malaysia blog (http://www.openmalaysiablog.com/2007/03/day_1_microsoft.html). Here

Dinesh Nair reported from the Microsoft Technology Summit 2007 (day 1), that a Microsoft representative, Bill Hilf, has stated:

[What got really interesting was when Yusseri raised the issue of OOXML and why didn't Microsoft just work on ODF in collaboration instead of creating a new, bloated standard. Bill [Hilf]'s answer was quite surprising, as he clarified that the file format (OOXML) was a part of the software and that OOXML and the software (MS Office) are quite inseparable. Ergo, OOXML is an integral and inseparable part of MS Office. That's why they could not adopt ODF as the file format for subsequent versions of MS Office.]

In that case, the question becomes whether Massachusetts can switch to a different application that does indeed follow the standard. In the current market, such a switch would be very difficult, if not impossible.

- - Patent and other legal encumbrments

As I understand it, any entity involved in the development of an ISO standard should list all patents it controls or knows of, or any other legal encumbrments that cover an implementation of that standard. Although Microsoft publicly states that it does control patents that cover the whole or parts of the subject matter described in OOXML, it so far has never published these patents. Nor has it stated which patents controlled by third parties cover OOXML. Microsoft has only given a "Covenant Not to Sue".

The wording of this covenant is rather terse and intricate. According to the text, it is possible to produce an application that implements OOXML such that it can read and write the same OOXML documents as MS Office 2007, but that is not protected by this covenant. To quote the covenant (note the phrases "necessary", "required portions", and "not merely referenced"):

[To clarify, "Microsoft Necessary Claims" are those claims of Microsoft-owned or Microsoft-controlled patents that are necessary to implement only the required portions of the Covered Specification that are described in detail and not merely referenced in such Specification. "Covered Specifications" are listed below.]

We must assume that Microsoft added these restrictions for a reason.

Microsoft has commissioned the firm Baker and McKenzie to perform an

analysis of the Covenant Not to Sue

(<http://www.bakernet.com/BakerNet/Resources/Publications/Recent+Publications/OpenXML.htm>).

After reading this text, I got the distinct impression that the author evaded the important question: When does the Covenant Not to Sue not protect me? Whenever this question comes up, the author falls back to quoting the original text of the covenant without explanation.

On the whole, Microsoft are very evasive when asked what is and is not covered by the covenant not to sue. The Malaysian SIRIM TC4 held a meeting on Ecma 376 (see report on the Open Malaysia blog http://www.openmalaysiablog.com/2007/02/billions_of_doc.html), Microsoft was represented by Stephen Mutkoski (Regional Director for Interoperability and Innovation, Microsoft Asia APAC Corporate Affairs team). A committee member was interested in this very same question and directly presented it to Stephen Mutkoski:

[“Well, in the brief time I had to review Ecma 376, I could not locate a section on Macros within the large document. Also Microsoft Excel 2007 (beta) has an alternate file format to save which “includes Macros” which suggests that the Ecma 376 specification is deficient.

So if Macros are not included in Ecma 376, will developers who develop it independently get sued?”

“I will have to get back to you ...”]

I have not seen any report on his answer.

In a response to questions raised during the Second meeting of the WordProcessing ML Sub-Committee of India

(<http://www.odfalliance.in/files/2007-07-05%20Minutes%20with%20comments%20by%20Microsoft.pdf>,

see also above), Microsoft responded to remarks and questions in the minutes. One referred to the non-open nature of parts of the OOXML standard:

[- Dr Bhattacharya queried if OOXML explicitly defines formula schema or are they referenced to non-open segments. Mr Kapur said that he will get back with the clarification in a detailed note to the convener, within 7 days from the date of the said meeting.

[answer]

The above point [sic] does not seem to have been captured correctly. It was clearly stated that the formulas are specified in the specification. There is no such thing as “non-open” segment.]

In my view, this obviously evades the relevant question: Are people protected by the covenant or not when they implement formula schemas? The covenant clearly states that there are parts of OOXML that are NOT covered. But it does not specify clearly which parts are not covered. I consider the answer by Mr Kapur just a play with words.

In comments to the Paper “Why ECMA OOXML cannot be regarded as a free/open document standard?” by Dr. Nagarjuna G, the Microsoft representative is in my view again evading the question (<http://www.odfalliance.in/files/Comments%20on%20Paper%20by%20Dr.%20NagarjunaG.pdf>):

[Furthermore, Microsoft has offered the Open Specification Promise (OSP) with regard to Open XML, and the OSP has been publicly supported by OSS legal luminaries. The standard itself is publicly available. This is entirely consistent with both Ecma and ISO/IEC IP policies. Just as Sun Microsystems did with ODF, Microsoft is making it clear that it will not assert its patents against software that is implementing the requirements of the standard, even if that software is not implementing the entire standard. Microsoft’s pledges go far beyond what is required by the patent policy of either Ecma or ISO/IEC.]

Sun has stated that it knows of no unlicensed patents that cover any implementation of ODF. But in the event that there might be patents found controlled by Sun that cover ODF, Sun has pledged not to assert them against anyone implementing any aspect of the ODF standard. Microsoft's covenant is completely different. First, Microsoft asserts that there are unspecified patents and/or copyrights that cover OOXML. Second, Microsoft does place limits on what implementations of OOXML are protected by the covenant. The patent policy of both Ecma or ISO/IEC do allow RAND licensing, so the fact that OOXML is within these requirements is not a consolidation. Especially as Microsoft still has not published what patents that cover OOXML it knows of.

And in the next paragraph of the same comments:

[It is pertinent to note that people are implementing ECMA 376 without problems. Furthermore, the paper does not present any specific evidence

that there is something in the Open XML spec around royalties which impedes the implementation of the specification on technical grounds – the actual test ISO uses. To be amply clear, before Open XML became an Ecma standard it had to pass the IPR rules Ecma has, and more immediately relevant to the discussion (by the formal ISO rules) JTC 1 has already reviewed the trademarks, IP, etc around Ecma Open XML before the Fast Track process began last January.]

This again does not take away my reservations. Currently, Microsoft lists a number of plug-ins and applications that can read and/or write OOXML documents. But all these applications have been produced by parties that are paid by Microsoft or have some kind of patent licensing agreement with Microsoft. For instance, Clever Age, Sun, Novell, and Linspire who have produced OOXML or ODF plugins or OOXML-ODF converters are all involved in patent agreements or contracts with Microsoft. I know of no implementations of parties that have no connection with Microsoft. So the existence of implementations of Ecma 376 produced by entities that have received explicit license or contracts to use Microsoft patents does not assure the legality of doing the same to entities that do not have such a relation with Microsoft.

Furthermore, the fact that this comment only refers to "royalties" in "something in the Open XML spec around royalties which impedes the implementation of the specification on technical grounds" might imply that there are other, non-royalty conditions connected to the covenant. Microsoft has been repeatedly criticized before for, so called, "Open Licenses" that contained explicit conditions that precluded the use of software under the GNU GPL. As the major competitors of Microsoft Office are distributed under the GNU GPL, any condition on the use of OOXML that would violate the GNU GPL can only be seen as directly anti-competitive.

To summarize my understanding of the licensing questions around OOXML. Microsoft has asserted unspecified IP encumbrments on OOXML. It has published a Covenant Not to Sue that contains explicit, limiting conditions in the text on implementations of OOXML. Such conditions would limit parties to produce implementations of OOXML and thereby gravely reduce the choice of applications for any entity in Massachusetts that would want to allow OOXML as a document format.

- - The economics of competing standards

Although I believe that economic considerations are of secondary importance to decisions that relate to sovereignty and document preservation, they clearly do influence policy. One economic argument frequently encountered in the press, is that competition between standards is beneficial to consumers. It is frequently made by Microsoft to support their separate, overlapping, document standard. We know that ODF and OOXML are almost completely overlapping standards as they can be used interchangeably by the same applications. That is, Microsoft Office2007, Koffice, and OpenOffice.org could all read and write both ODF and OOXML without the user being aware of the difference.

However, economic history shows us that a "standards war" is almost always bad for users and consumers. Mostly because it fragments the market and incurs conversion and infrastructure costs on the user. I would like to point you to a recent example which shows how large these costs, both realized and opportunity costs, can be.

In the latter part of last century, both the USA and the European Union (EU) made new cell-phone radio-frequencies available. The EU enforced a single standard, GSM, and universal interoperability. The USA allowed providers to compete on standards and interoperability. Nowadays, two decades later, we see a large difference between these two mobile phone markets. The USA market is still fragmented and I understand that consumers in the USA still pay higher prices for less service and quality than consumers in the EU. Handset technology on the USA market trails that of the EU by years. So in the global market, competition on standards and interoperability has hampered both market and technological development in the USA. I am afraid a double document standard might result in a likewise high cost to users and consumers in Massachusetts.

Please feel free to contact me for more information of questions.

Sincerely Yours,

Rob van Son
R.J.J.H.vanSon at uva.nl
Institute of Phonetic Sciences/ACLC
University of Amsterdam
room 313
Spuistraat 210-212
1012 VT Amsterdam, The Netherlands

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-----BEGIN PGP SIGNATURE-----

Version: GnuPG v1.4.2.2 (GNU/Linux)

Comment: Using GnuPG with Mozilla - <http://enigmail.mozdev.org>

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From: [Reijo Tomperi](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Please don't select OOXML
Date: Tuesday, July 17, 2007 2:54:37 AM
Attachments:

Hello,

I am a Software Engineer from Finland (Small country in Europe, also Linus Torvalds's home country.). I write propriety software at work and open source applications on my free time. Both are used around the world.

I'm writing to you about OOXML and asking you not to select it. Your decision will affect the whole world and if you decide to use only "really" open standards (Such as ODF), you will get respect around the world and possibly show good example to others so they can follow you.

Here is a short list why I think OOXML is bad:

- # OOXML is controlled by one company, not a standards body.
- # Microsoft likes proprietary formats and has only gone the open format route because the market/industry forced them to do so.
- # Microsoft was invited several times to join the ODF standards committee and refused all invitations.
- # The OOXML format is not actually open for anyone to implement: part of the specification references proprietary file formats (older ms-office formats) and proprietary, Microsoft-only code.

The people working on the information technology area around the world are worried that Microsoft will once again win simply by using enough money. This will again cost a lot of money and hurt everyone else, except Microsoft.

--

Br, Reijo Tomperi,
SW Engineer / FOSS developer

From: [Ken Hamilton](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please make ODF alone the document storage standard
Date: Tuesday, July 17, 2007 12:44:59 AM
Attachments:

Dear sir/madam,

As both a resident of Massachusetts and a professional software engineer for more than twenty years, I feel I must raise my voice in opposition to any plan that would declare Microsoft OOXML as an acceptable format for electronically archiving documents.

Instead you should standardize on ODF, a truly open standard which all vendors can support on equal footing. The current vitality of the Internet would not be possible without open standards such as HTML and CSS.

If MS OOXML is allowed to become an officially acceptable standard, it will commit Massachusetts taxpayers to the longterm costs of less competition for office software and future retrospective conversion of archives if and when open standards are finally truly and consistently supported.

There is no technical reason why Microsoft Office cannot be used to read and write ODF, if any state offices choose to use that particular software to process documents.

Please be logical. Please respect the taxpayers of Massachusetts. Please choose ODF alone as the digital document format for archiving office documents.

Thank you for your thoughtful consideration.

Sincerely,

Kenneth Hamilton
80 Park Street

Arlington, MA 02474

From: [Joseph Tomczyk](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ETRM v. 4.0 / Office Open XML
Date: Tuesday, July 17, 2007 12:19:13 AM
Attachments:

As a Massachusetts resident who has been employed in programming/software development positions, I greatly appreciate the state's push for open standards and formats. Open standards/formats that are widely accepted and used make interoperability much easier, or in some cases possible in the first place, and enable the development of both competing and compatible products. Unfortunately, I don't think Office Open XML (OOXML) helps achieve these goals.

The state's guidelines for open formats state that they should be based on open standards and full documented, which is a good decision. However, there are parts of the OOXML specification that ignore existing ISO and W3C standards, and there are parts that aren't fully documented, particularly those for importing other formats, which basically amount to things like "do this the way Word 95 does it", despite Word 95 not being publicly documented. A much simpler and more reliable solution would be for old types of formatting etc. to be converted during the import process, making it much less complicated to implement the new format.

Overall, I feel that OOXML is overly complicated and does not meet the state's previously established requirements.

-Joseph Tomczyk

From: [Robert Bushman](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OOXML Standard Consideration
Date: Monday, July 16, 2007 11:52:25 PM
Attachments:

Hi,

I am a senior software engineer. Over the past fifteen years I have worked at a variety of companies, from little five man startups to fortune 500 enterprises. For the past five years, I have worked heavily with XML, and with automated document generation. Which is to say, I have spent a great deal of time helping companies generate wealth through the use of document standards.

I understand that the Commonwealth of Massachusetts is considering including MS OOXML in their list of approved document standards, and that you are soliciting opinions from people in the field. I have studied the OOXML standard, and hope my observations may be of some assistance.

The acceptance of OOXML in its current form as a standard is contrary to the intent of having standards. The purpose of a document standard is to ensure that any party can participate equally in the generation of, and interpretation of, documents. This is a laudable goal for government, and a mission critical goal in the day-to-day life of corporations. However, a standard which is unclear, subject to interpretation, or which relies on proprietary knowledge is not merely inadequate, it is detrimental to the very goal of standardization.

The flaws in OOXML are legion, and I will not delve into them all, but I would like to present one that is so blatantly inappropriate for a standard that it should be an automatic disqualification.

One of the attributes in the OOXML standard is

"useWord97LineBreakRules." The documentation contains no further clarification of what those line break rules are. It is not possible for anyone other than Microsoft to implement this particular attribute correctly, because it requires knowledge that only Microsoft has. We could observe the behavior of Word 97 in some particular case, and model that behavior. But what happens when you have a hyphenated word immediately prior to the line break? Or when a line break falls near a page break? By referencing their own proprietary product, Microsoft has guaranteed that only Microsoft can be fully compliant with the specification. That is not a standard, that is vendor lock-in.

Simply stated, in its current form, OOXML is not a document standard. It is the existing Microsoft .doc format thinly wrapped in XML tags. It was not written with the intent of being an open standard, and so it should not be considered for inclusion in a list of open standards.

Thank You,

Robert Bushman

From: [Peregrine](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Microsoft's OfficeOpen XML specification (Ecma 376)
Date: Monday, July 16, 2007 10:50:18 PM
Attachments:

I do not believe that Microsoft's OOXML specification should be approved as an open standard. This specification is incredibly hard to implement, deliberately obfuscated, and contains many omissions necessary for implementation. If the specification is adopted many people will be unable to access state documents without special proprietary software. True Open standards allow anyone access and have multiple implementations. There is only one implementation of OOXML, and it is unlikely there will be others anytime soon. Approving this is not in the best interests of the people of Massachusetts.

From: [Jay Bradbury](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Reference : Microsoft MS-OOXML Proposed Standard
Date: Monday, July 16, 2007 10:30:31 PM
Attachments:

Dear Sirs,

As a Massachusetts resident, I wish to express my opposition to Microsoft's proposed open standard. The document that is being presented has only had a preliminary review and has not been accepted as a legal standard by any recognized body.

During the preliminary review period, literally hundreds of issues were raised with the specification. These included technical errors, incomplete specifications, references to Microsoft proprietary specifications, and requirements that have never been implemented. Until these issues have been addressed, this specification should not be considered for further review.

A major problem could occur for the Commonwealth, if we accepted a specification that was not fully compatible with or not accepted as an international ISO Standard. The present Open Document ISO standard that has been accepted by the Commonwealth of Massachusetts is recognized and accepted around the world. This standard could be extended to include desired components that are contained in the Microsoft proposal.

Please either reject the current proposal or table it until it becomes an approved standard.

Sincerely,
Joseph T. Bradbury
224 Klaus Anderson Rd.
Southwick, MA 01077

From: [Steven W McDougall](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Microsoft's OfficeOpen XML specification
Date: Monday, July 16, 2007 10:21:48 PM
Attachments:

I am writing to urge the state of Massachusetts *not* to adopt, approve, or use the Microsoft OfficeOpen XML specification (Ecma 376). If Massachusetts stores data in the Ecma 376 format, then it becomes dependent on Microsoft to access that data.

Put bluntly, if you use their format, then they own your data. Since Massachusetts is a state, this implicates basic issues of governance and sovereignty.

There are many technical problems with Ecma 376. Groklaw provides a collection of links on this topic at its

ODF-MS XML TIMELINE/RESOURCE PAGE

<http://www.groklaw.net/staticpages/index.php?page=20051216153153504>

I have been working in the computer industry for some 25 years. During that time, I have seen Microsoft grow from an ordinary software company to an industry-controlling monopoly. It uses its money, size, and influence not just to crush its competition, but to blockade any technical innovation that might threaten its monopoly position.

Standards threaten Microsoft's monopoly, because they allow consumers a choice of competing vendors. Microsoft has a long history of acting to subvert standards. For more information on this, see the Halloween documents, at

http://en.wikipedia.org/wiki/Halloween_documents

As a sovereign state, Massachusetts has an opportunity to establish the Open Document format as a standard for its data, and break free of Microsoft's control. I ask your fullest consideration of this issue.

- SWM

From: [Warren Strange](#)
To: [Standards \(ITD\);](#)
CC:
Subject: MS-OOXML
Date: Monday, July 16, 2007 10:16:34 PM
Attachments:

It is clear to any reasonable person that MS-OOXML is a specification which in practice can only be implemented by a single vendor.

Endorsing both ODF and MS-OOXML is not a solution - it's a cop out, and will result in the status quo (i.e. documents being authored and editable in MS Office only).

The world is watching Massachusetts. You have the opportunity to demonstrate leadership and liberate your citizens from proprietary document formats. Show some courage and just say no to the Microsoft lobbyists.

Sincerely

Warren Strange

From: [Taylor R Campbell](#)
To: [Standards \(ITD\)](#);
CC:
Subject: public comments concerning open documents, the OpenDocument specification (ISO/IEC 26300:2006), and Microsoft's OOXML
Date: Monday, July 16, 2007 8:47:37 PM
Attachments:

The Commonwealth has recently announced that it would consider Microsoft's proprietary format, Office Open XML, or OOXML, as an `open' format for data interoperability in public offices. As a citizen of Massachusetts, I wish to express opposition to this consideration, and to request that the Commonwealth exclude Microsoft's OOXML from any lists of open formats to be used in public offices.

Microsoft's OOXML is neither an internet standard, nor a standard of the International Organization for Standards, nor a standard of the Institute of Electrical and Electronics Engineers, nor a standard of the American National Standards Institute. Microsoft's OOXML has been recognized by only one standards body, ECMA, whose web site describes it as `the inventor and the main practitioner of the concept of ``fast tracking' of specifications, [...] generating a healthy competitive landscape based on differentiation of products and services, rather than technology models, generating confidence among vendors and users of new technology.'

Despite Microsoft's `fast track' of ECMA to a standard for Microsoft's OOXML, it was not until after the International Organization of Standards unanimously passed the OpenDocument specification as ISO/IEC 26300:2006 that ECMA finally approved Microsoft's OOXML as ECMA 376. Subsequently, ECMA approved submission of Microsoft's OOXML to the ISO/IEC -- a submission that conflicts with the domain of an already established international standard for open document formats. This may `generate confidence' for vendors like Microsoft, but it does not inspire confidence in concerned citizens like myself. Microsoft appears intentionally oblivious to existing, established standards and

alternative implementations, both of which are critical for the continued and reliable operation of technology in public offices.

More than a year after the approval of the OpenDocument specification as ISO/IEC 26300:2006 on the third of May in 2006, Microsoft's OOXML is still not a standard of any other standards body -- internet, national, or international, and its status as an `open' standard has been called into severe question by many organizations such as the Free Software Foundation Europe. Specifically, the FSFE has posed six questions of the openness of Microsoft's OOXML to any standardization bodies that might consider it; these questions have been made visible to the public at <<http://fsfeurope.org/documents/msooxml-questions>>, which also contains further references concerning the openness of Microsoft's OOXML and its encroachment on the domain of the truly open OpenDocument specification, ISO/IEC 26300:2006.

It is the duty of the public offices to support the people's rights and choices, not to accept the terms of private enterprises.

Microsoft has the resources to produce software that complies with the international standards, and whether Microsoft will choose to do that depends on whether the users demand Microsoft to do that. Do not let Microsoft's proprietary formats into the public offices when the alternatives are truly open, international standards.

From: [Hiroaki Kuromiya](#)
To: [Standards \(ITD\);](#)
CC:
Subject: documents standards
Date: Monday, July 16, 2007 8:05:07 PM
Attachments:

Hello,

I am writing to express my concern about the state's unwarranted considerations of Microsoft's "OfficeOpen XML". In spite of the name, OfficeOpen XML is not open: it is controlled not by public organizations but by one company, a monopoly, which may not guarantee a perpetual access to all documents produced by public organizations like the state of Massachusetts. Such a "standard" should be avoided by any public organization, particularly when there are already truly open, public standards of OpenOffice (odf). Commercial companies can write a fully-compatible converter to open standards if they want to sell their products. Therefore I strongly oppose our state's adoption of Microsoft's format.

Sincerely,

H. Kuromiya
Dover, MA

Moody friends. Drama queens. Your life? Nope! - their life, your story. Play Sims Stories at Yahoo! Games.
<http://sims.yahoo.com/>

From: [louisbelark at comcast.net](mailto:louisbelark@comcast.net)
To: [Standards \(ITD\);](#)
CC:
Subject: Please support Open XML
Date: Monday, July 16, 2007 5:18:36 PM
Attachments:

as a citizen of Massachusetts, I am interested in the state adopting the Open XML standard for use by state agencies

Open XML will allow the state to maintain its investment in existing knowledge worker software as well as remaining committed to open document standards now and for the future

Sincerely


Louis B Clark
444 Atlantic Ave
Swampscott, MA 01907

From: [Brian Snyder](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open XML
Date: Monday, July 16, 2007 5:07:06 PM
Attachments: [image001.gif](#)
[image002.gif](#)

To whom it may concern:

I am writing to express my support for the Open XML framework for any standards based technology decisions for the Commonwealth of MA going forward. We are a national consulting firm of over 250 people with offices here in Waltham, MA that builds many solutions based on the Open XML framework and we see firsthand it's benefits to State and Local government technology and application development projects. Open XML meets all state requirements as an open standard and therefore should be approved. We have seen significant support for Open XML in the marketplace already. Open XML will enable a wider choice of technologies and will spur greater innovation and competition within the Commonwealth. Please let me know if you have any further questions in regards to my statements above.

Regards,
Brian

Magenic [®]		Microsoft 2007 Eastern Region Partner of the Year
<i>Brian Snyder</i> <i>Northeastern Regional Business Development</i> <i>Manager</i>		<i>Magenic Technologies</i> <i>1050 Winter Street</i> <i>Suite 1800</i> <i>Waltham, MA 02451</i> <i>tel: 781-478-1444</i>  <i>fax: 617-507-7916</i> <i>mobile: 781-267-0233</i> 
<i>briansn at magenic.com</i>		
Want to always have my latest info?		Want a signature like this?

From: [Steve Shervais](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Opposing adoption of Microsoft's OfficeOpen XML specification
Date: Monday, July 16, 2007 5:04:47 PM
Attachments:

I am a management information systems professional, a member of ACM and IEEE, with twenty years' experience in MIS in government, industry, and academia. Based on the discussions I have seen, the Microsoft documentation of its OpenOffice XML standard does not rise to the level of a specification, but is, at best, a description. The difference is that a specification (for example the Open Document Format) will allow a developer to build a tool that will work to the standard, without requiring the use of proprietary software, while a description will not. Adopting the OpenOffice XML specification will not provide the technical advantages of a true standard, and will greatly increase the cost of interoperability.

Historically, unless driven by existing public standards, vendors have no incentive to make their software interoperable with others' tools, and every incentive to promote vendor lock-in. Admittedly, some vendors have seen the value of building to open standards, while others have attempted to exploit a monopoly position to freeze others out of the market. Microsoft is the most obvious culprit here, as attested by the US court system. I see no reason to believe they will change their culture at this late date. The risk, then, is that a future MS action could once again limit the market and limit the options available to government. The result would be increased costs to users.

The adoption of the MS OpenOffice XML specification is therefore a bad idea technically, and economically. In the end, it will allow a future Microsoft to hold hostage the sovereignty of a future Massachusetts government.

Stephen Shervais, Ph.D.
Associate Professor, MIS
College of Business and Public Administration
Eastern Washington University

Cheney, WA 99004

509.359.4280

You understand ONE, so you think you understand TWO.

Because one and one are two.

But you must also understand AND

From: [David Hoch](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Open XML
Date: Monday, July 16, 2007 5:01:06 PM
Attachments:

To Whom It May Concern:

I believe the Open XML standards should continued to be used.

As an international open standard of Ecma International, Open XML meets all state requirements as an open standard. Use of the format will help enable citizens and state agencies to access electronic files well into the future.

There is significant support for Open XML in the marketplace today as shown by the support in openxmlcommunity.org and openxmldeveloper.org, and many independent developers and their customers are benefiting from this new technology.

Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

David Hoch

Managing Member

Inclusive Technologies LLC

3480 Rockefeller Court, Unit E

Waldorf, MD 20602

301-632-5501 202-315-6859

[dhoch at inclusivetechologiesllc.com](mailto:dhoch@inclusivetechologiesllc.com)

Yahoo! oneSearch: Finally, [mobile search that gives answers](#), not web links.

From: [Robert Rae](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Ecma 376 - Office Open XML File Formats ("Open XML")
Date: Monday, July 16, 2007 3:57:14 PM
Attachments:

To whom it may concern,

I have been very pleased to read that you are considering the addition of Open XML to the list of acceptable standards for government documents. As a Massachusetts taxpayer I was concerned about the exclusion of this format as it relates to Microsoft technologies, which are the tools of choice for the majority of our government users. Allowing agencies to choose the format that most directly meets their needs will ensure efficiencies and cost reductions well into the future.

Robert Rae

Local listings, incredible imagery, and driving directions - all in one place! [Find it!](#)

From: [Lybarger, Barbara \(MOD\)](#)
To: [Standards \(ITD\); Hamel, Linda \(ITD\);](#)
CC: [Berloff, Myra \(MOD\);](#)
Subject: Proposed ETRM 4.0
Date: Monday, July 16, 2007 2:57:08 PM
Attachments:

In reviewing the proposed ETRM 4.0, I noticed three things that are of concern.

First, in Domain: Information, Discipline: Data Formats, DESCRIPTION, the second paragraph last sentence states: "It is the policy of the Commonwealth of Massachusetts that all official records of the Commonwealth be created and saved in an acceptable format as detailed below."

Doesn't this exceed ITD's authority in that it seems to reach outside the Executive Branch and it would seem to raise the longstanding issues between ITD and the Secretary of State?

Second, the only mention of accessibility issues I noticed is in footnote #1 at the end of the same section. Wouldn't it also make sense to discuss the limitation of the accessibility of the various formats?

Third, Word processing related formats listed only include HTML, OXML, ODF, PDF and RTF. All of which have significant accessibility issues for people with disabilities, ranging from systemic incompatibility of the format with adaptive technologies (OXML [see http://openxmldeveloper.org/archive/2007/07/02/Accessibility_of_Open_XML.aspx] and RTF), to the unavailability of applications that use the format which are also capable of interacting effectively with adaptive tech (ODF), and to the need for expensive specialized applications and/or highly trained operators to create accessible documents using the particular format (PDF), to the limitation of the format for creation of complex print documents (HTML).

It is universally recognized that the .DOC format is the most accessible, with the lowest level of expertise required of the operator to produce accessible content. Even though it is not an open format, wouldn't it make sense to allow use of .DOC until the other formats evolve a bit more.

Barbara E. Lybarger, General Counsel
Massachusetts Office on Disability
One Ashburton Place, #1305
Boston, MA 02108
[617] 727-7440
[800] 322-2020
[617] 727-0965 FAX

From: [Dale Sopel](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open XML standard
Date: Monday, July 16, 2007 2:43:52 PM
Attachments:

Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

--

Dale Sopel
Coastal Data Management
Ph. (508) 992-4619
[DSopel at CDMWeb.com](mailto:DSopel@CDMWeb.com)

From: [Paul Byrne](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open XML
Date: Monday, July 16, 2007 2:17:14 PM
Attachments: [image001.jpg](#)

Dear Sir/Madam:

With respect to the topic of open XML I would strongly urge you NOT to adopt a proprietary standard that will lock the state into a select few vendors. The implications behind this move involve:

- The inherent cost having few vendor options vs. many (Oligopolies are not efficient for buyers)
- Upgrade path on technologies that are not widely supported have typically proven to be much more expensive and hamstringing the ability of the user to stay "current".
- Lastly, the service level/responsiveness of a single supplier is always suspect when there are no competitors who can fill the shoes of the current provider.

All of these are compelling reasons to adhere to this path!

Regards,
Paul Byrne

Paul Byrne
President & CEO



Office (858) 277-1097
Mobile (858) 382-6081
Website www.readytechinc.com

From: [Paul Messina](#)
To: [Standards \(ITD\)](#);
CC:
Subject: OfficeOpen XML
Date: Monday, July 16, 2007 1:58:04 PM
Attachments:

To whom it may concern,

OfficeOpen XML should not be considered to be an open standard. While it could be a defacto standard in a few years because of microsofts dominance of the market, it is by no means open. It is simply a definition of Microsoft's file format, with no input from any other company. It contains many features that make it backwards compatible with microsoft's older formats, a noble goal for microsoft to implement, but which, according to microsoft's own statements, cannot be fully implemented by people outside microsoft. Requiring implementation of a closed spec within an open spec makes it no longer open. Open Document format is the only modern file format that is actually open. It has been implemented fully in several competing products, on multiple platforms, compared to one product, on one platform, for OfficeOpen XML. Please require that open formats are actually open, to avoid vendor lock in.

Sincerely,
Paul Messina

From: [Rick Jewell](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open XML stardard
Date: Monday, July 16, 2007 1:56:03 PM
Attachments:

Please support the open XML standard. There is significant support in the Open XML marketplace today.

Best regards,

Rick Jewell

From: [Jon Bonds](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Document Format
Date: Monday, July 16, 2007 1:48:59 PM
Attachments:

I am of the opinion that Open Document Format is much needed due to the implementation of it in so many other parts of the world.

I think it is also needed so that users of Linux, Openoffice, and Apple Mac products can communicate via common documentation not requiring any sort of translation to a Microsoft Proprietary Standard.

That's one man's opinion.

JB

Smart Medicine. Inspired Care. And the awards to prove it. Recognized as a Top 50 Healthcare Network. To learn about other recognition and awards Baptist has earned, visit: <http://www.bmhcc.org/aboutus/awards/index.asp>
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From: [Pepoli, Bethann \(ITD\)](#)
To: [Standards \(ITD\);](#)
CC:
Subject: FW: Kevin MacDonald.rtf
Date: Monday, July 16, 2007 1:46:09 PM
Attachments: [Kevin MacDonald.rtf](#)

From: Micolonghi, Emily (ANF)
Sent: Monday, July 16, 2007 1:34 PM
To: Pepoli, Bethann (ITD)
Subject: Kevin MacDonald.rtf

<<Kevin MacDonald.rtf>>

Bethann-- FYI: This was sent to ANF via the IQ system

Emily

From: [James Sanford](#)
To: [Standards \(ITD\)](#);
CC:
Subject:
Date: Monday, July 16, 2007 1:23:08 PM
Attachments:

Technology policies should enable government agencies to choose from technologies and products that meet their needs. Accepting the Open XML standard will enable wider choice, which will spur competition and innovation.

James

From: [Ted MacLean](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open XML File Formats
Date: Monday, July 16, 2007 1:19:11 PM
Attachments:

To Whom It May Concern:

I am writing to voice my support for the Commonwealth of Massachusetts proposal to add Open XML format to its policy for creating and storing documents such as text documents, spreadsheets and presentations. I believe that this proposal will enable choice among file formats and allow selection of technologies to be based on their merits.

As a Massachusetts taxpayer, I want the state to establish policies that enable government agencies the flexibility to choose from the technologies and products that best meet their needs. I expect that by accepting the Open XML standard, the state will help enable wider choice, while spurring competition and innovation and enabling citizens and agencies across the state access to electronic files well into the future.

Thank you for your consideration of my perspective.

Sincerely,

Ted MacLean
160 Sewall Avenue
Brookline, MA 02446

From: [Carte, John](#)
To: [Standards \(ITD\);](#)
CC:
Subject: MS OPEN XML vs ODF
Date: Monday, July 16, 2007 1:08:57 PM
Attachments: [image001.gif](#)

Ladies and Gentlemen of the Standards Committee,

Please closely examine what is really happening here. MicroSoft is unwilling to agree with a standard that would benefit the whole computing community. MS does not seem to want to compete in the software industry. They are too willing to buy or bludgeon their way into industries, governments and schools. A little competition might do MS well. If people have a real choice MS might have to really pay attention to providing software that is competitive and not dominating. The bottom line of MS OPEN XML is that it only benefits MicroSoft, ODF benefits all, including MS. The tortuous way that they support conversion to ODF XML only verifies their intent.

Thanks for your consideration,
John

John E. Carte

Senior Component Engineer
Tollgrade Communications, Inc.
493 Nixon Road
Cheswick, PA 15024
[jcarte at tollgrade.com](mailto:jcarte@tollgrade.com)
Ph : (412) 820-1443
Fax: (412) 829-1534

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From: [Steve Bailey \(Ames & McBain, Inc.\)](#)
To: [Standards \(ITD\);](#)
CC: [lrotert at revonet.com;](mailto:lrotert@revonet.com)
Subject: Open Standard
Date: Monday, July 16, 2007 12:38:07 PM
Attachments:

Standards group!

As an international open standard of Ecma International, Open XML meets all state requirements as an open standard. Use of the format will help enable citizens and state agencies to access electronic files well into the future. How about backward compatible and a small file size also.

Steve Bailey
Ames & McBain, Inc.
Data Collection, MES, WMS
800-925-4844

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.476 / Virus Database: 269.10.6/902 - Release Date: 7/15/2007
2:21 PM

From: [John Fisher](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Comments on ETRM 4.0 Draft in Favor of ECMA-376
Date: Monday, July 16, 2007 11:40:03 AM
Attachments:

To Whom It May Concern,

I'm writing in response to ITD's request for comments on the proposed changes in the draft ETRM 4.0, specifically in favor of the addition of the ECMA-376 Open Office XML File Format to the approved open formats. I'm a lifelong citizen of the Commonwealth as well as a professional in the software and IT Services industry and feel strongly that the addition of the ECMA-376 standard to the ETRM enables greater options and choice not only for citizens and organizations conducting business with the Commonwealth, but the agencies as well. Over the years I have worked with various agencies and I believe that the policies and standards are important, however they should also allow agencies to select products and technologies that meet their specific agency requirements and not put a burden on them or anyone conducting business with them. By adding the ECMA-376 standard you will be allowing for a much larger population of products and technologies in use by citizens, business and agencies for electronic file formats while still adhering to standards.

Thank you for your attention to stay in tune with the latest international standards and create/revise policies that work for the good of everyone in the Commonwealth. I look forward to the acceptance of ECMA-376 as part of the ETRM 4.0.

-John Fisher
65 Lake Shore Rd.
Natick, MA 01760

From: [Chuck McCann](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Adopting OpenXML as a standard
Date: Monday, July 16, 2007 11:27:59 AM
Attachments:

I encourage you to add OpenXML to the State list of approved document formats. As an internationally approved standard with increasing support in the industry, allowing OpenXML will increase our ability to access electronic files from a variety of platforms, which will contain costs and increase participation in our government.

Thank you,

Charles P. McCann
2 Ottada Way
Pepperell, MA 01463

Missed the show? Watch videos of the Live Earth Concert on MSN. [See them now!](#)

From: [Chris Adams](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Ecma-376 advice
Date: Monday, July 16, 2007 11:23:15 AM
Attachments:

As a concerned technology-aware individual I urge you to oppose the addition of Ecma-376 - Office Open XML Format.

Selecting a single-vendor "open" format will make managing data more difficult and expensive in the long term.

While hundreds of people may be working on OOXML there are thousands working on ODF and thousands of companies are members of an ODF alliance to ensure the use, promotion, and development of the Open Document Formats (ODF).

OOXML is a single vendor format, while ODF is a multi-vendor format. This means every operating system can easily develop a NATIVE application that supports ODF, while it will be less likely for the same happening for OOXML.

It is also important to note that ODF came about out of necessity for technology improvement. OOXML came about out of necessity to maintain market shares and turn a profit. The products developed for OOXML are of good quality and easy to recommend, but many of the products for ODF are similar in function and usability while costing considerably less. The more ODF is promoted, the more development will increase on the tools that support ODF, which will drive innovation and forward progress more than simply buying into a new single-vendor product.

At a previous job, I switched to strictly ODF-based tools in an all Microsoft environment and functioned for many months before mentioning I had switched. (And only then because people were asking me how I was able to save PDF's so easily and with usable form-fields.) I have installed OpenOffice on many computers for a wide variety of user-types. (most were non-technical individuals looking for something simple yet flexible)

When deciding between two open formats you are given the opportunity to find what will be best in the long run for your state, and it is a great decision to have to make, but please do not be supported by the organization with the best marketing, rather support the organization with the most community involvement and the most cooperation with government organizations.

Thank you for your time, and I hope this letter has helped shed some light on the cons to using a proprietary single-vendor document format. If you have any questions, I would be more than happy to research the answers for you.

--

Chris

From: [Bob German](#)
To: [standards at state.ma.us;](#)
CC:
Subject: Comment on Open XML in Massachusetts
Date: Monday, July 16, 2007 10:20:47 AM
Attachments:

Hi – I’m a Microsoft employee and registered voter in Massachusetts, and I want to speak out in favor of the acceptance of Open XML format for use in the Commonwealth. Since I work for the vendor, it’s hard for me to be objective about the products involved, so instead I’d like to comment as someone who has worked with computer standards over nearly three decades on the general strategy of preserving our government information assets over time.

Earlier in my career, I worked on a set of standards called “OSI” or “Open Systems Interconnect”. These standards came out of preeminent standards bodies: domestically by ANSI and internationally by ISO. We were all sure they would take the world by storm and replace existing protocols such as TCP/IP.

A couple of decades later, this email is travelling to you over TCP/IP. The OSI protocols were fine technically, but there wasn’t a strong enough business case to get people to replace the installed base of TCP/IP computers, routers and other devices. In the end, OSI faded into obscurity, and TCP/IP was upgraded to meet the needs OSI would have fulfilled without requiring re-training and re-tooling of the installed base.

The reason I bring this up is to point out that the longevity of a format or protocol has more to do with its market acceptance than its having been blessed by a standards body. Which is more likely to be available in 30 or 100 years – programs which read an obscure standard format, or programs which can read a format used by a wide majority of computer users over a period of many years? Just try and find software for OSI today, as compared with TCP/IP, and you’ll get my point.

To my mind, Open XML is strategically the best of both worlds. It’s being driven by the most widely accepted vendor of word processors, and we can be sure it will gain wide market use. And it’s also a documented standard which anyone could write software to read and write. Furthermore, it’s based on XML, which is a very

popular standard and which, coincidentally, is designed to be easy to transform using software, so it's easy to envision translators from Open XML into whatever format is popular decades from now.

Thus I'm glad to hear about the decision to approve Open XML for use by the Commonwealth, both because I like Microsoft products and feel they will make state information workers the most productive, and because I think it's a good bet strategically as well.

Thanks for reading this, and know I'll continue to watch this issue!

(NOTE: This email represents my personal opinions and does not necessarily reflect the opinions of my employer. I was notified of the situation by my employer but was not offered any incentive or penalty based on writing or not writing this, and nobody at Microsoft knows if or what I wrote here.)

From: [gerryfh at comcast.net](mailto:gerryfh@comcast.net)
To: [Standards \(ITD\)](#);
CC:
Subject: Open Doc Standards
Date: Monday, July 16, 2007 10:07:32 AM
Attachments:

As you are considering adding Open XML to the standards you support, I am in full support of anything that might help improve your ability to work with your customers, the taxpayers (individual and corporate), and the various suppliers, partners, and NGOs you interact with.

--

-gerry
Gerry Fulbrook-Hanna
80 Charter Road
Acton, MA 01720

From: [Michael Whitehouse](#)
To: [Standards \(ITD\)](#);
CC:
Subject: adopting the Microsoft OpenOffice XML specification (ETRM v4.0)
Date: Monday, July 16, 2007 10:02:05 AM
Attachments:

To Whom It May Concern,

For the following reasons this standard should not be adopted by the State of Massachusetts.

1. There is already a standard ISO26300 named Open Document Format (ODF): a dual standard adds costs, uncertainty and confusion to industry, government and citizens;
2. There is no provable implementation of the OOXML specification: Microsoft Office 2007 produces a special version of OOXML, not a file format which complies with the OOXML specification;
3. There is missing information from the specification document, for example how to do a autoSpaceLikeWord95 or useWord97LineBreakRules;
4. More than 10% of the examples mentioned in the proposed standard do not validate as XML;
5. There is no guarantee that anybody can write a software that fully or partially implements the OOXML specification without being liable to patent damages or patent license fees by Microsoft;
6. This standard proposal conflicts with other ISO standards, such as ISO 8601 (Representation of dates and times), ISO 639 (Codes for the Representation of Names and Languages) or ISO/IEC 10118-3 (cryptographic hash);
7. There is a bug in the spreadsheet file format which forbids to enter any date before the year 1900: such bugs affects the OOXML specification as well as software versions such as Microsoft Excel 2000, XP, 2003 or 2007.
8. This standard proposal has not been created by bringing together the experience and expertise of all interested parties (such as the producers, sellers, buyers, users and regulators), but by Microsoft alone.

+

| Michael Whitehouse Owner, Phoenix Games
| cell: 413-218-7946 Chair, Pi-Con
| AIM: fireheartreborn Program DivHead, Arisia

+

| When life hands you lemons, make apple pie
| and let them wonder how you did it.

| --Lisa Wood

+

From: [Kurt Dominik](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please do not adopt OOXML
Date: Monday, July 16, 2007 9:28:16 AM
Attachments:

I apologize that I do not have time to put forth a complete and technically precise breakdown of OOXML (I think it's authors intended as much).

Please keep ODF as the de facto format standards for government records in your state. Your decision has implications for generations to come. My grandchildren may need to do legal research about issues in Massachusetts based on decisions I make in my life (who knows?) and I really doubt that Excel2060 will be compatible with Excel2007 (otherwise, why have the year in the program name?) -- nor do I expect any other for-profit software company to have products which are backward compatible over generations (much less years).

I have converted my own house to using only Open Document Format compliant programs for archiving our own data (because of the May 1, 2006 ISO/IEC decision to make ODF an ISO standard). By it's own definition and intention, I know ODF will be there when my children use these documents. I would never trust this information to OOXML as it is incomplete and has only purchased credentials. OOXML exists only to further the purposes of a single software company, not individual citizens.

I hope you will reject it's use with the important, vital data produced by a state government. Generations to come will prosper or suffer on this decision. Stick with ODF exclusively. Please.

Thank you for making this issue known to the public.

Thanks for your time and consideration of my comments.

Sincerely,
Kurt Dominik
Olathe, Kansas

From: [David Kula](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Support for OpenXML
Date: Monday, July 16, 2007 8:57:56 AM
Attachments:

To Whom it May Concern,

I am a citizen of the State of Massachusetts and I am sending this email to express my support for the OpenXML document formats. I support this format over the Open Document Format (ODF) for the following reasons:

1. Open XML is an international open standard endorsed by ECMA and it meets all state requirements as an open standard.
2. There is significant support for Open XML in the marketplace today.
3. Accepting OpenXML will enable wider choice, which will spur innovation and competition.

Sincerely,

David G. Kula
22 Woobly Road
Bolton, MA 01740

Missed the show? Watch videos of the Live Earth Concert on MSN. [See them now!](#)

From: [Fava, Mitch](#)
To: [Standards \(ITD\);](#)
CC:
Subject: open source fair competition
Date: Monday, July 16, 2007 7:11:46 AM
Attachments:

Dear Sirs,

Please keep the competition for open source software which supports "open document formats" alive and support ODF by Oasis & Adobe PDF & others. Thank you.

Mitch Fava

From: [Christian Haugan Toldnes](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Ecma 376 a viable alternative to Open Document?
Date: Monday, July 16, 2007 4:18:35 AM
Attachments:

Dear sirs

I'm writing this because what you do is not only of great importance to the people of Massachusetts, but ultimately to the people of the world.

First, let me excuse my English, I'm from Norway, but will do my very best. After all, language is all about communication and the sharing of thoughts, amongst us humans.

Actually, it's tempting to use this as a metaphor to try to explain why Ecma 376 can never be a viable alternative to an open standard, like Open Document. I'll do another one, based on my mothers cooking later on. :)

So again, I'm from Norway, and the reason I'm able to communicate with you today, is my (although limited) knowledge of the English language.

The strongest limitations is perhaps my glossary, I guess. Sometimes native English speakers use words and phrases I do not comprehend. I usually get by this obstacle by guessing, reading the meaning out of the context. But sometimes that fails. Thankfully my guessing of the meaning of words and phrases isn't critical to the rest of the public, all our records are written in Norwegian.

Nevertheless. Even skilled translators sometimes have problem with slang, or words which meaning is linked with cultural ties, inside jokes, and so on. This is also true for digital translators.

I use English as my language of international communication, because it's a de facto standard nowadays. It shows that a de facto standard works, as long as it's free, that is.

I have the freedom to learn to speak and write and understand English,

without limitations beyond my own, and without paying a license fee to anyone for this knowledge and the application of it.

Now, consider someone owning English. Someone owning the very meaning of the words, forcing me to buy a license to speak or write or even read and understand the language. Silly? Correct. Nobody would ever use the language. Again, correct. Except too many important documents, papers, books are already written in English. Too much history. The loss of not using the language would be too great. Unbearable.

Yet, here we are today. A great amount of history is embedded into the old, non-open document formats of Microsoft. And you have seen this problem, and want to change the faith of the state, to a point where you can be absolutely certain that people, in the future, can read and learn that history.

So you look at alternatives, and have found Open Document as one such. And now you are evaluating Microsoft Office OpenXML as another. And here I have to include a piece of my mother's cooking...

Given a recipe like this:

2 ts of sugar
3 sp flour
1 oz grandma's secret topping
...
...

Now, I can't make whatever that would be a recipe for, since I don't know what "grandma's secret topping" actually is. It's not something I can get in any grocery shop, that's for sure. :)

It's the same as in Ecma 376: "useWord97LineBreakRules" a code word found in Ecma 376 has some explicit meaning to the Microsoft Office products, but the "standard" includes no explanation of what it actually means. It's grandma's secret topping. Or one example of it, at least.

And that's exactly what Ecma 376 gives you. Almost enough openness to be able to bake the cake, but it doesn't taste the same, because you don't have enough information to actually make an identical copy of the original cake. Unless you bind yourself to use Microsoft products forever and ever, and feel confident that they will exist for all eternity. It's a corporation, they tend to not do that. :)

Why choose something that's embedded in risk?

Thank you very much for your time. Your work is greatly important to the rest of the world, and we are watching the progress made towards a secure way of keeping the records accessible for our children.

Sincerely yours

Christian

--

Christian Haugan Toldnes
Chief Engineer IT-section
The faculty of Medicine
Norwegian University of Science and Technology

From: [Bonnie Miller](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Adopting the Microsoft OpenOffice XML specification (ETRM v4.0)
Date: Monday, July 16, 2007 12:49:45 AM
Attachments:

To Whom It May Concern,

For the following reasons this standard should not be adopted by the State of Massachusetts.

1. There is already a standard ISO26300 named Open Document Format (ODF): a dual standard adds costs, uncertainty and confusion to industry, government and citizens;
2. There is no provable implementation of the OOXML specification: Microsoft Office 2007 produces a special version of OOXML, not a file format which complies with the OOXML specification;
3. There is missing information from the specification document, for example how to do a autoSpaceLikeWord95 or useWord97LineBreakRules;
4. More than 10% of the examples mentioned in the proposed standard do not validate as XML;
5. There is no guarantee that anybody can write a software that fully or partially implements the OOXML specification without being liable to patent damages or patent license fees by Microsoft;
6. This standard proposal conflicts with other ISO standards, such as ISO 8601 (Representation of dates and times), ISO 639 (Codes for the Representation of Names and Languages) or ISO/IEC 10118-3 (cryptographic hash);
7. There is a bug in the spreadsheet file format which forbids to enter any date before the year 1900: such bugs affects the OOXML specification as well as software versions such as Microsoft Excel 2000, XP, 2003 or 2007.
8. This standard proposal has not been created by bringing together the experience and expertise of all interested parties (such as the producers, sellers, buyers, users and regulators), but by Microsoft alone.

Sincerely,
Bonnie E. Miller

From: [Keith Dick](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ETRM 4.0
Date: Monday, July 16, 2007 12:05:52 AM
Attachments:

Hello,

I am not a resident of Massachusetts, so perhaps you are not permitted to take my comments into account. In case that is true, I'll be brief, so as not to waste my time or yours. I care about your decisions because they will have influence outside of Massachusetts.

ECMA-376 is not an open standard by any reasonable definition of the term. It is merely one of Microsoft's continuing efforts to lock in customers. Given that Microsoft is a for-profit corporation, such efforts are understandable, and, in fact, since corporations are required by their duty to stockholders to do everything in their power to maximize profits, such efforts are almost mandatory for them.

But lock-in is not good for customers. Your duty is to do your best to get the most value for Massachusetts and its citizens for the money spent on Information Technology. Forcing your vendors into real competition to supply solutions based on open standards is one way to achieve that.

Simply accepting Microsoft's story that ECMA-376 is an open standard is not a good way to promote competition. I'm sure you have received many explanations of how ECMA-376 falls far short of being an open standard, so I will not repeat them here. The main point is that it lacks detail on numerous points such that independent implementation of the standard is not possible. There are other objections, too, as I'm sure you know. I urge you to reject ECMA-376.

If you find it impossible to completely reject

ECMA-376 as an acceptable format for storing
Massachusetts' information, at the very least, put
ECMA-376 into the "Other Acceptable Formats" category,
not the "Open Formats" category. Be honest that you
are accepting a proprietary solution.

Keith Dick
Sunnyvale, California

Boardwalk for \$500? In 2007? Ha! Play Monopoly Here and Now (it's updated for today's economy) at
Yahoo! Games.

<http://get.games.yahoo.com/proddesc?gamekey=monopolyherenow>

From: [Robert Hafner](#)
To: [Standards \(ITD\)](#);
CC:
Subject: adopting the Microsoft OpenOffice XML specification (ETRM v4.0)
Date: Sunday, July 15, 2007 8:13:46 PM
Attachments:

To Whom It May Concern,

For the following reasons this standard should not be adopted by the State of Massachusetts.

1. There is already a standard ISO26300 named Open Document Format (ODF): a dual standard adds costs, uncertainty and confusion to industry, government and citizens;
2. There is no provable implementation of the OOXML specification: Microsoft Office 2007 produces a special version of OOXML, not a file format which complies with the OOXML specification;
3. There is missing information from the specification document, for example how to do a autoSpaceLikeWord95 or useWord97LineBreakRules;
4. More than 10% of the examples mentioned in the proposed standard do not validate as XML;
5. There is no guarantee that anybody can write a software that fully or partially implements the OOXML specification without being liable to patent damages or patent license fees by Microsoft;
6. This standard proposal conflicts with other ISO standards, such as ISO 8601 (Representation of dates and times), ISO 639 (Codes for the Representation of Names and Languages) or ISO/IEC 10118-3 (cryptographic hash);
7. There is a bug in the spreadsheet file format which forbids to enter any date before the year 1900: such bugs affects the OOXML specification as well as software versions such as Microsoft Excel 2000, XP, 2003 or 2007.
8. This standard proposal has not been created by bringing together the experience and expertise of all interested parties (such as the producers, sellers, buyers, users and regulators), but by Microsoft alone.

Sincerely,
Robert Hafner

From: [C. Scott Ananian](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ETRM 4.0 comments
Date: Sunday, July 15, 2007 3:12:42 PM
Attachments:

I would like to express my concern about the Open Formats section of the review draft of version 4.0 of the state ETRM, in particular the claim that Microsoft's Open Office XML (OOXML) format meets the guidelines for openness and archivability. As you are no doubt aware, the use of XML in a document format only addresses the syntax of the contents; the *semantics* (that is, meaning) of the document must still be documented and open. As the ETRM draft writes, "The Commonwealth defines open formats as specifications for data file formats that are based on an underlying open standard, developed by an open community, affirmed and maintained by a standards body and are fully documented and publicly available."

The ECMA standardization of OOXML does not consist of enough detail to meet this bar. The 6000-page specification was much too large to review in the given ECMA review time period and many inaccuracies, inconsistencies, and omissions remain in the published standard. Even a casual search for the phrase "application-defined" inside the standards document will confirm this: "application-defined" behaviors are, by definition, *not* "fully documented" by the ECMA standard.

Further, the "highest levels of legacy compatibility" which the ETRM claims are available from OOXML are precisely those features which are not documented or demonstrated. Features such as "autoSpaceLikeWord95", "useWord97LineBreakRules", "useWord2002TableStyleRules", "likeWrapLikeWord6", "supportTopSpacingWP" (this last referring to a 16-year-old version of WordPerfect) are deprecated and their behavior is undefined. Before claiming that alternative vendors such as "OpenOffice Novell Edition, and NeoOffice 2.1 [and] Corel [...] WordPerfect 2007" (ETRM) implement the OOXML spec, it should be demonstrated that they properly implement the legacy compatibility which OOXML claims to provide to

the commonwealth. This testing will reveal that the claims of legacy compatibility are a sham: these features are present but not well-defined in the OOXML standard, and there is no archival documentation of how these features work which will allow future generations to view Massachusetts government documents as they originally appeared.

The proper solution is to use an accepted and well-documented standard, such as ODF --- or even PDF, well-documented albeit de-facto --- and to use conversion tools to generate ODF from the legacy formats which exist. In this way we can ensure that undocumented legacy compatibility features are translated to their meanings, as expressed in a truly open format, and do not impair readability for our future generations. If there are legacy features which are inexpressible in ODF, work should be undertaken with a standards body to define them and record their behavior, and to ultimately include support for the features in future versions of some truly open standard.

At the present time, the OOXML specification does not meet Massachusetts' requirements for an open document format.

C. Scott Ananian
29 Quincy St #1
Somerville, MA 02143

From: [Mark Forster](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OOXML document format
Date: Sunday, July 15, 2007 2:20:55 PM
Attachments:

Dear Standards Team

I have some concerns regarding the potential adoption of Microsoft OOXML.

The issue of forward readability is a central one in any discussion of document management and the relative worth of document formats.

It is in the interest of proprietary software vendors to remain in control of the document format(s) and to periodically change them in such a way that the user base is required to purchase newer version of the products concerned. Only by this means can a steady revenue stream be guaranteed for these vendors. The document formats themselves are a closely guarded secret, normally binary in nature to make the task of decrypting them harder.

In stark contrast open source software vendors, utilising open standards, insist that the format is well described by a complete specification. There are no restrictive license fees or patents to inhibit the free creation of software packages read/write the format. The document format will be controlled by a third party body (OASIS in the case of the open document format), and changes will only rarely be required in order to incorporate emerging new features. Backward compatibility should be maintained so that old documents remain readable by newer versions of the software, this cannot be guaranteed with proprietary formats. You are at the mercy of the vendor.

The UK national archives have described the forward readability issue of old file formats as a "ticking time bomb" - see the link below

<http://news.bbc.co.uk/1/hi/technology/6265976.stm>

The only way to read the older file formats proved to be to emulate older versions of Windows on newer PCs. A substandard solution.

The Microsoft Office Open XML format (OOXML) fails to make use of existing standard formats such as scalable vector graphics (SVG) for drawings and MathML for equations. Consequently the leading scientific journals such as Nature and Science will not currently accept this format.

See the link

<http://www.zdnet.com.au/news/software/soa/Microsoft-Office-dumped-by-Science-and-Nature/0,130061733,339278690,00.htm>

Put simply OOXML is not open because it contains patented IP designed to hinder interoperability.

See the link below

<http://www.nooolxml.org/patents>

Given that open document format is already an existing ISO standard, another (less open) standard is not required. Acceptance of OOXML for state use simply perpetuates the current problems of forward readability and lack of true open standards highlighted above. Ultimately it will mean higher costs for taxpayers and fewer or lower quality state services as a result.

Mark

From: [Tom Faska](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ETRM Draft 4.0
Date: Sunday, July 15, 2007 1:03:07 PM
Attachments:

Information Technology Division
Commonwealth of Massachusetts
Attention: Beth Ann Pepoli

July 15, 2007

Re: ETRM Draft 4.0

Dear Ms. Pepoli:

As a computer user for over now over 25 years I have seen the desktop world become dominated by a single office suite, Microsoft Office. Over the years I have used many software applications that had features both better and worse than Microsoft Office. The biggest problem was interoperability and a standard file format. Unfortunately, software in the United States and much of the world has become dominated by a single office suite. This monoculture has many weaknesses, including lack of price competition, lack of innovation, lack of choice, and increased susceptibility to security breaches, among other concerns.

While the contribution of OOXML to ECMA will provide a greater likelihood of being able to access documents created in Office in the future, even that outcome is in doubt. Microsoft has become infamous for their "embrace and extend" strategy. There is a significant question whether ECMA 376 can truly be considered to be an "open standard:"

- * Will ECMA 376 become a true consensus standard? Will the evolution of ECMA 376 be far more influenced by Microsoft than has any prior "open" standard been influenced by any single vendor?
- * Will Microsoft continue to contribute all new features it develops

to ECMA 376? Like any other vendor, Microsoft will have no obligation to offer future technology to ECMA. Is any standard truly "open" if its continuing utility is based upon the future product decisions of a single vendor?

- * Will there be true choice in the marketplace? At 6,039 pages, it is unlikely that any office suite will be created that fully implements ECMA 376. The ability to exchange documents with true fidelity between Office and any other product is likely to remain low.
- * Will there be true innovation in the marketplace? The microscopic level of detail represented by those same 6,039 pages will place a straitjacket on innovation, restricting any implementation to rigid conformance.
- * Will there be true competition in the marketplace? Recently the marketplace has become energized, with more than a dozen proprietary and open source office suites available, all of which implement ODF.

True open standards are important they protect end-users from lock in, promote competition in price and features, and encourage a healthy balance between agreement upon a common layer of standardization and the ability of competitors to innovate on features. I do not believe that ECMA 376 qualifies as an open standard.

As true open standards are crucial to an open society, I urge the ITD to refuse to include ECMA 376 on its approved list.

Sincerely,

Thomas S. Faska
VP, Engineering

PhyFlex Networks, Inc.
515 Groton Road
Westford, MA 01886

From: [David Merriman](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF vs OOXML
Date: Sunday, July 15, 2007 12:06:20 PM
Attachments:

I would like to encourage - in the strongest possible terms - that the State of Massachusetts adopt the Open Document Format as its standard file format, versus OOXML.

The reasons for this are simple.

ODF is a truly *open* format - fully, completely, and publicly documented, implemented by _multiple vendors_, and accepted as an international standard.

OOXML, on the other hand, is the brainchild of a SINGLE vendor that has a _demonstrated history_ of creating inadequately documented proprietary file formats that it then uses to (effectively) hold their users data hostage.

David Merriman

--

David Merriman

WEB: <http://www.twoofeverything.org>

BLOG: <http://www.twoofeverything.org/blog>

From: [Ernest Turro](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ODF/OOXML
Date: Sunday, July 15, 2007 9:30:09 AM
Attachments:

Please reject OOXML as an open standard for storing and transferring public information. You owe this to your citizens. Here are some reasons:

- There is already a standard ISO26300 named Open Document Format (ODF): a dual standard adds costs, uncertainty and confusion to industry, government and citizens;
- There is no provable implementation of the OOXML specification: Microsoft Office 2007 produces a special version of OOXML, not a file format which complies with the OOXML specification;
- There is missing information from the specification document, for example how to do a autoSpaceLikeWord95 or useWord97LineBreakRules;
- More than 10% of the examples mentioned in the proposed standard do not validate as XML;
- There is no guarantee that anybody can write a software that fully or partially implements the OOXML specification without being liable to patent damages or patent license fees by Microsoft;
- This standard proposal conflicts with other ISO standards, such as ISO 8601 (Representation of dates and times), ISO 639 (Codes for the Representation of Names and Languages) or ISO/IEC 10118-3 (cryptographic hash);
- There is a bug in the spreadsheet file format which forbids to enter any date before the year 1900: such bugs affects the OOXML specification as well as software versions such as Microsoft Excel 2000, XP, 2003 or 2007.
- This standard proposal has not been created by bringing together the experience and expertise of all interested parties (such as the producers, sellers, buyers, users and regulators), but by Microsoft alone.

Best,

Ernest Turro

From: [Pete Harlow](#)
To: [Standards \(ITD\);](#)
CC:
Subject: File Formats
Date: Sunday, July 15, 2007 6:34:42 AM
Attachments:

Dear Sir/Madam

I am an English engineering consultant living in France, but have contributed a lot of documentation to the Commonwealth in the past in the form of replies to requests for procurement for fare collection equipment for the MBTA.

This type of documentation involves producing a custom document from a series of base documents and boilerplate sections to produce a final result which is both coherent and visually attractive.

Much time has been wasted in the past when one has been constrained to use proprietary word processing tools and file formats which have proved unsuitable for the work in hand. This is due to the undocumented nature of the file formats which make them difficult to use in automated document production systems.

The situation has now changed with the advent of the OpenDocument Format (ODF - ISO/IEC 26300) which is both open and well specified, leading to the development of a rich selection of processing software and the possibility of producing in - house any tools required which are not available outside.

I was very pleased therefore to learn that Massachusetts had decided to adopt ODF as the main format for public documentation seeing this as a positive step forwards to a situation where there was problem free interchange of documentation between the people, businesses and government.

I am now dismayed to learn that Massachusetts is considering conveying the status of an open standard on Microsoft's OfficeOpen XML specification (now Ecma 376).

I fear that if this standard were to be accepted by the Commonwealth, commercial and political pressure would subsequently be brought to bear to make this the

ONLY acceptable standard, and then people such as myself would have to perform file conversion before submitting documents, and as this is never perfect, subsequent re-editing of documents before submission would be required. Obviously this procedure would involve costs that would have to be passed on to somebody.

Even if two standards were to exist concurrently, problems would occur[1]. Document production using Ecma 376 is not a feasible course of action, as despite the name the specification is not open [2] and many details are undocumented [3].

I urge you to continue with your original plan of action to adopt the OpenDocument Format (ODF - ISO/IEC 26300) as a state standard for public documentation and to reject any adoption of Ecma 376.

Best Regards,

Peter Harlow IEng MIET

[1] <http://osacademy.hosting.amaze.nl:9090/odformat/repository/white-papers/dual-standards-2013-more-choice-or-less>

[2] <http://www.itwire.com.au/content/view/13391/1054/1/1/>

[3] <http://www.robweir.com/blog/2007/06/no-representation-without-specification.html>

From: [Oran Magal](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please don't make OOXML an "open" standard, because it's a deception and mockery of "open"
Date: Sunday, July 15, 2007 4:51:54 AM
Attachments:

Dear Sirs,

I am writing following publications that you intend to declare MS OOXML an "open" standard for the purposes of state law. This would, I urge you, be a mistake: it is a closed format which only one vendor will be able to reliably work with, and that is Microsoft itself, the author of the standard. There is as yet only one ISO-approved open standard, which is not tied to any vendor. Surely this is what the great state of Massachusetts had in mind, and not the mockery of supposedly open standard which perpetuate vendor lock-in.

Yours sincerely,

Oran Magal

From: [alan c](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Document Format
Date: Sunday, July 15, 2007 3:08:53 AM
Attachments:

I am surprised that the reports you are considering propose standards other than Open Document Format.

This ODF exists already as an independent format clearly viable for ongoing use in future. To accept creation of more standards defeats the object of a standard, and obviously creates future complications and dependencies.

I trust you will decide that an Open standard should be what it says - open, and standard, and they as you will support the use of ODF.

--

alan cocks

From: [Brian Beattie](#)
To: [Standards \(ITD\)](#);
CC:
Subject: OpenOffice XML, NOT an Open Standard
Date: Saturday, July 14, 2007 11:11:16 PM
Attachments:

I am writing you to voice my opinion as a Software Engineer with 30 years experience. The continuing access public documents is extremely important. The use of proprietary formats is the greatest long term threat to such access. Despite the misleading name and Microsoft's attempt to force it's document standard through a standards process, OpenOffice XML is not by any reasonable measure an Open Standard. It should be remembered that Microsoft is an adjudged illegal monopoly, that has shown itself willing to use unlawful means to maintain it's monopoly. It seems possible that Microsoft's effort to push it's standard is yet another attempt to extend it's monopoly.

--

Brian Beattie LFS12947 | "Honor isn't about making the right choices.
beattie at beattie-home.net | It's about dealing with the consequences."
www.beattie-home.net | -- Midori Koto

From: [R S Prigan](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Microsoft's OfficeOpen XML specification (now Ecma 376)
should not be an acceptable "standard"
Date: Saturday, July 14, 2007 5:08:41 PM
Attachments:

Microsoft's OfficeOpen XML specification (now Ecma 376) should not be an acceptable "standard."

It has certain damaging limitations which tend to lock people into using Microsoft products. I encourage you to push for use of ODF (Open Document Format) as a true ISO standard. Microsoft can be encouraged to provide simple and direct support for ODF, if not eventually adopting it as their default format!

Richard S Prigan
<http://OSApistle.com>

From: [Ramon Sole](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Comments on the Information Domain (ETRM v4.0)
Date: Saturday, July 14, 2007 4:05:04 PM
Attachments:

Dear Sirs,

I would like to point some inaccuracies in your document Information Domain (ETRM v4.0), most of them regarding the standard ECMA-376.

Firstly, ECMA-376 is not an "full" open standard, at least if we understand "open" as freely deployable by anyone. The standard keeps some copyrights to Microsoft, and just "allow" and "promise" developers to use them at no charge. But an open standard should mean "full open", with no copyrights at all.

Furthermore, it's not possible to develop a ECMA-376 application with some additional and disclosed information from Microsoft. The standard is full of references of the kind "that has to be compatible with Office 2003 format" or "that is defined as in Office 2003". How open is an standard that requires compatibility with an copyrighted products whose formats are not open?

The document states "Open XML is currently supported by a variety of office applications including Microsoft Office 2007, OpenOffice Novell Edition, and NeoOffice 2.1." That's not true at all. No one application supports ECMA-376. The only application that supports natively part of ECMA-376 is Microsoft Office 2007. OpenOffice and NeoOffice can import and export Open XML through filters, but that doesn't mean those application "supports" the format. In addition Open XML is not supported by MS Office 97, MS Office 2000 or MS Office 2003.

Furthermore, the addition of Ecma-376 - Office Open XML Formats (OOXML) is a harmful step backwards for the Commonwealth for the following reasons:

- The Commonwealth should encourage harmonization - Adoption of Ecma-376 / OOXML would discourage harmonization by creating a disincentive for

Microsoft to harmonize with existing open standards such as ODF and with other -- non-Microsoft -- applications. One XML standard is better than several XML standards, and ODF is by far the obvious choice if you pick up just one.

- The Commonwealth should encourage interoperability - Adoption of Ecma-376 / OOXML would be a shift away from interoperability offered by ODF because OOXML is a single vendor format that is not interoperable with other formats and applications.

- The Commonwealth should encourage choice - Adoption of Ecma-376 / OOXML would eliminate choice because as a single vendor format, it does NOT provide choice of applications support, like ODF.

Thanks a lot for the opportunity to comment the ETRM documents you offered.

Best Regards,

Ramon Sole
Desktop Solutions Consultant

From: [Tom Bauman](#)
To: [Standards \(ITD\);](#)
CC:
Subject: file standards
Date: Saturday, July 14, 2007 3:40:10 PM
Attachments:

Please register my protest to using Microsoft's OfficeOpen XML specification as an open standard in the State of Massachusetts. As a computer professional, I can tell you that it is not "open", nor is it a standard.

Please register my support for the Open Document Format (odf).

Thank you.

Tom Bauman
Tommy B. Studio
709 Turtle Hill
Driftwood, TX 78619

From: [Alex Chejlyk](#)
To: [Standards \(ITD\)](#);
CC:
Subject: OOXML adoption caveat
Date: Saturday, July 14, 2007 3:35:21 PM
Attachments:

Hello,

The largest problem I see with OOXML is that Microsoft will not license it without restrictions. Microsoft will own the standard. There are many technical issues with ECMA 376, most involve the proposed standard's backward compatibility with Microsoft's own proprietary formats, but having one corporation control the format is the most problematic.

If Microsoft were to "improve" the OOXML specification after it has been accepted as an "open" standard, we would be forced to wait for the published changes. The licensing scheme Microsoft is using could essentially close the formerly open standard with poorly documented changes. The poorly documented changes could be intentional or by mistake, the end result would be the same, a format that can only be properly accessed by Microsoft's own programs. Even if the flawed documentation were corrected, valuable time would have been lost for any competitor of Microsoft's programs. This scenario would force users to use Microsoft's products in the interim. In this scenario, the safe bet would be to stay with Microsoft's product, after all, they own the standard! This is exactly what Microsoft wants, we would be right back where we started.

Please do not accept OOXML as an open standard. The truly open and ISO accepted ODF format is accessible to everyone, including Microsoft.

Sincerely,

Mr. Alex Chejlyk

From: [Kyle Winkler](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please provide documents under an open specification
Date: Saturday, July 14, 2007 1:47:26 PM
Attachments:

As a citizen concerned that essential government information can only be accessed by using expensive, proprietary Microsoft products, I am glad that the state of Massachusetts has agreed to provide documents in a format that can be accessed by the people as a whole. However, it appears that OOXML is now being considered to provide such a "standard". It should be noted that OOXML requires implementors to emulate the behavior of Microsoft products.

These behaviors are not specified. For more information, please see http://www.grokdoc.net/index.php/EOOXML_objections.

Please note that OpenDocument does not have these restrictions, and can be implemented correctly by anyone, including Microsoft. Please give it proper consideration in your selection process.

Best of Luck,
Kyle Winkler

From: [kbar at ccsisp.com](mailto:kbar@ccsisp.com)
To: [Standards \(ITD\);](#)
CC:
Subject: ETRM v4.0 re Ecma-376 XML format
Date: Saturday, July 14, 2007 1:21:39 PM
Attachments:

Hello,

I am writing to express my concern of adoption of a proprietary format as an additional acceptable format for government documents. Although I am a resident of Connecticut, I believe that with ETRM v4.0 the Commonwealth of Massachusetts is setting an excellent example for all the States and thus will effect every person in the United States.

The Ecma-376 Office Open XML (OOXML) format is actually a proprietary format owned and controled by the Microsoft Corporation and thus is not freely implementable by other organizations that may desire to create documents for public and or government use. There is nothing "open" about it regardless of its name or what others may claim.

Microsoft Corporation is in full control of OOXML format and therefore Microsoft can modify the OOXML format at any time making previously generated documents incompatable with newer implementations as well as making later generated documents incompatable with older implementations. Also, documents created using OOXML may not be 100 percent compatable with OASIS document processing applications. There is no need, and it is unwise, to adopt potentially incompatable standards for document generation.

One particular danger I see here if OOXML is adopted as an additional acetable format, is that it will force people to use Microsoft proprietary products to deal with public and government documents created using OOXML format. People must be allowed free choice in how they deal with public and

government documents. I personally, as well as many others, neither desire nor choose to use any Microsoft products and that is our free choice. It would be clearly wrong for any government to force or require the public, even if indirectly, to use the products of one specific company when dealing with any public and government documents.

The OASIS document format is completely documented, completely unencumbered, and is freely implementable by anyone or any organization. It is a true "open" standard. Even Microsoft is free to provide full support for OASIS format in its document preparation applications and, I believe, is fully capable of doing so. If Microsoft feels that they would be excluded from participating in public and government document preparation if OOXML were not adopted as an additional format in ETRM v4.0, it is by their own choice, not because of the actions of the Commonwealth of Massachusetts.

Thank you for taking the time to read this email. I hope that the Commonwealth of Massachusetts remains dedicated to the adoption of truly "open" standards that no single corporate entity controls. You are setting an example for the rest of the world as well as the rest of the United States.

Please, do not adopt OOXML as an additional format for ETRM v4.0.

Thank you, again.

Sincerely,

Kedric C. Bartsch

From: [mikem](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Standards for True Freedom
Date: Saturday, July 14, 2007 10:24:01 AM
Attachments:

To All Concerned,

I would just like to say that it would be wise to make the chosen format as generic and open to free access as possible. We appear to now have a chance to make ONE standard with which to guide the future better than the past. Taking the power away from any one vendor and putting in the hands of a neutral standard can only be the best way to go. The past tells us that we should do ODF and create as true a real standard as possible for the people.

Thank You,
Mike Murray

From: [Don C. Myers](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Standards
Date: Saturday, July 14, 2007 10:08:58 AM
Attachments:

Dear State of Massachusetts,

I've been very involved with technology for the past 15 years. As a consumer, I've used Perfect Office, Microsoft Office, and Open Office. As a web designer, I've used Frontpage and Dreamweaver. I receive numerous technical publications to keep current on the issues in the rapidly and continuously changing field of computers and technology.

I was very proud of Massachusetts when you chose about a year and a half ago to only have open standards. I have been personally affected by vendor lock in, and the expense it becomes. I was very disappointed when I recently read that you were going to consider the Microsoft OpenXML also to be an open standard.

How is the Microsoft OpenXML truly open? It isn't. Can other office programs access OpenXML documents? No. Microsoft belonged to the organization which created the ODF. They had the opportunity to be an active participant, and to utilize ODF. Instead, they chose to create their own new standard, which is proprietary, which only users of Microsoft products have access to. Have they made OpenXML available to other office suits so everyone, whether they own Microsoft software or not, has access to and can create documents in OpenXML? No!

Because of the spiraling cost of vendor lock in with Microsoft, I've been a user of Open Office for the past three years. I have not used Microsoft Office at all in this period of time. I do considerable amounts of work in spreadsheets and word processing. I have not had one instance where I have not been able to do the things I need an office suite to do efficiently and effectively. I've not had any compatibility issues with any Microsoft formatted documents which have been sent to me, or which I have saved in Microsoft format and sent to others using

Microsoft software. For 95% of what most users will do in a spreadsheet or a word processor, Open Office is more than sufficient. How much would the State of Massachusetts save in tax dollars if 95% of your employees used Open Office instead of Microsoft Office?

If you approve the Microsoft OpenXML as a standard, you are requiring the citizens of your state to own Microsoft software to have access to the documents created in that format. This is an extreme burden on the lower income people in your state who cannot afford the proprietary software from Microsoft.

I hope that you will approve, for the common good of all, only one open standard, the one which is truly open and does not create vendor lock in, ODF.

Don C. Myers

--

From: [Andrew Chilton](#)
To: [Standards \(ITD\);](#)
CC: [pj at groklaw.com;](mailto:pj@groklaw.com)
Subject: Public Comment on ETRM Draft 4.0
Date: Saturday, July 14, 2007 9:58:21 AM
Attachments:

Information Technology Division
Commonwealth of Massachusetts
Attention: Beth Ann Pepoli

Dear Ms. Pepoli,

I write to you in regard to considering adding Microsoft's OOXML to your list of approved standards in the Enterprise Technical Reference Model (ETRM) 4.0.

Firstly I urge you to look further into the ECMA-376 Office Open XML standard to discover for yourself a number worrying inconsistencies [1], incorrect fundamentals [2] and dubious instructions [3] contained within the so-called standard. The standard itself reads more like a 'what Word does' rather than 'what an open document should describe' which is unlike any other open standard I know of. All of this is even before looking into the almost impossible technicalities of implementing such a long specification in itself, something that even Microsoft will find hard to do, let alone an independent software supplier. Considering that an alternative format, ODF, is already specified completely, already has a number of independent implementations and already provides a future proof format I consider the proposal of OOXML not only wrong but also redundant.

As shown in the above links, there are many arguments against OOXML but I shall not concentrate on those since I'm sure that others who write to you in regard to the same subject will already point these out. Alternatively, I'd like you to consider the following situation.

It has been recently reported [4] that the UK National Archives has chosen to access their old proprietary data using a proprietary

operating system running a proprietary emulator to run old proprietary programs [5]. This, in my opinion is the wrong way of doing it. While this might be one solution to reading the data, there is no mention of actually converting it to a new format. If they did, in their case the UK National Archives may choose to convert to OOXML but this still leaves them in exactly the same position as they are now - their data will still be stored in what is essentially a proprietary format which can only be read by programs from one company, Microsoft.

No matter how you look at it, this still equates to a monopoly for one company and leaves the UK National Archives in the same position Microsoft admitted to putting them in in the first place. This is the same company who, by stating that OOXML is an 'open' format (they're wrong [6]) is trying to push ODF (a truly open format) off the rails and into oblivion. Who is to say that in 3 or 5 years time, if ODF has been pushed aside, Microsoft won't just go back on their word and create incompatibilities with OOXML just like they have deliberately done with previous versions of Word itself.

This then means that you are in exactly the same position, or worse, as you were previously and the good judgment of specifying ODF as an approved standard in ETRM 4.0 will have been all for nothing. It will also leave us in the 'digital dark age' Mr. Frazer, Microsoft UK, predicts, at his company's doing.

Finally, I'd like to mention why I, a Citizen of New Zealand, would want to write to you regarding your choice of approved standards within your state and how that affects me and my country.

You are probably aware in the importance of your decision for the future of data standards and accessibility. We live in an information age, a data sharing world, the Internet Revolution and make no mistake about it, this revolution is just as important as the Industrial Revolution before it, if not much more so. It is important that our decisions now are good not only for us but for our future and for those that come after us. Were it not for completely 100% open standards in the computer world this information age could never have happened. Computers wouldn't even be able to talk to each other let alone speak the same language, if truly open standards had never existed.

Countries like New Zealand are influenced heavily by decisions made in

other countries. As a small country, we are ripe for the Government to take a stand against phony standards and choose to save and store all our data in open formats. It's an ideal situation to be able to choose open standards such that the Government won't waste public money on converting from one proprietary format to another and still get it wrong. We can't afford to spend millions of New Zealand dollars on incorrect storage and conversions to broken and incomplete standards unlike the UK tax payer is being forced to.

Massachusetts, as a state of 6.4 million people and we, New Zealand, as a country of 4 million people have many similarities and therefore any decision you come to may affect decisions that we, or other governments or central organisations throughout the world, make. This is a fantastic opportunity for you to take the lead, take a stand and show the rest of us the way.

So finally, I urge you again, please do not accept the ECMA-376 OOXML proposal as an approved standard in the ETRM 4.0 and choose only those which attain a 'true' standard, such as ODF. This will enable countries like New Zealand to point to previous examples, such as Massachusetts, where open standards have worked, are being used, have saved money and also have the freedom to choose supplier of such solutions. None of this would be true if ECMA-376 OOXML is chosen as an approved standard.

Yours sincerely,

Andrew Chilton

Note: this open letter also appears at:

<http://kapiti.geek.nz/random/open-letter-to-information-technology-division-commonwealth-massachusetts.html>

[1] http://www.grokdoc.net/index.php/EOOXML_objections#Ecma_376_is_immature_and_inconsistent

[2] <http://www.robweir.com/blog/2007/07/formula-for-failure.html>

[3] http://fussnotes.typepad.com/Achieving_Openness_1point0.html#sdendnote8anc

[4] <http://news.bbc.co.uk/2/hi/technology/6265976.stm>

[5] <http://kapiti.geek.nz/random/updating-proprietary-file-formats-the-wrong-way.html>

[6] <http://www.onlamp.com/pub/a/onlamp/2007/06/14/achieving-openness-a-closer-look-at-odf-and-ooxml.html>

[6] <http://www.onlamp.com/pub/a/onlamp/2007/06/14/achieving-openness-a-closer-look-at-odf-and-ooxml.html>

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contact: Andrew Chilton

website: <http://kapiti.geek.nz/>

From: [Webster Knight](#)
To: [Standards \(ITD\);](#)
CC:
Subject: MSOOXML
Date: Saturday, July 14, 2007 9:36:13 AM
Attachments:

My dear Commonwealth of Massachusetts:

This letter comes in reference to your consideration of document standards for your state word processing and other types of documents. I hear that you are considering something called Microsoft Office Open XML (MSOOX). Let me warn you that this is really a very big wolf in sheep's clothing. This is a Trojan horse that you don't want relieving itself within your walls.

Let me tell you about these Microsoft people. They are very powerful and used to having their own way. They have a Monopoly on the desktop computer operating system and they use it to force retailers to promote only their products. They suffer Apple just to let the government rationalize leaving them alone. They are more powerful than most countries and every state like yours. They can buy influence like nothing you have ever seen except the KGB. Journalists sing for their supper and politicians fawn over them lest they support their opponents. They can pass laws and shut down companies in the blink of an eye. Even the US Courts and the European community cannot budge them.

Schools have brought me to Massachusetts for my family and me. It is an enlightened state with distinction as a leader. It is amazing that Microsoft, the 8,000-pound Gorilla, let you declare ODF as a standard. Well they are coming back at you with this MSOOX. Let me assure you, it MSOOX.

First of all, MS Office Open XML is neither open nor a standard. Microsoft doesn't want anything open and they do not want a standard other than their own.

If they wanted a standard, they could open up one of their own. This MSOOX is not open because only MS can understand it fully and implement it fully. It would be a waste of time for anyone else to bother. They will not give up their Monopoly on the desktop. If there were a true standard that was open to others, then one could produce that format without MS software. People could stop upgrading their hardware and software so often. They could choose.

Calling MSOOX an open standard is a lie. MS innovates only to obscure and lock everyone in to their products. MS is the problem. They are why you are so desperately looking for a way to produce state documents so that you can archive them and still read them. If you adopt the MS non-standard, you are going to have the same problem when MS want another infusion of cash other than their annual license with a roll-out of the next Vista Churnware. All of this increases your hardware expense too. A true open standard will be hardware and software blind, implementible by all. Two standards are worse than one. You will have to maintain the capability to do both.

As a Monopoly Microsoft can generate billions with a poor product. If you select them, you will give them billions more extra. So you have to decide. Will you remain the Commonwealth of Massachusetts or the Kommonwealth of Mikrosoft?

Your Humble Servant,

--

Webster Knight
Suite 201
419 Seventh St NW
Washington, DC 20004-2235
202.265.5000 (but temporary to desk: 202.370.0206)
Fax 202.638.4279
cell 202.489.4580

From: [Michael Tasseron](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Document Format and Microsoft OpenXML
Date: Saturday, July 14, 2007 9:33:35 AM
Attachments:

Dear Sir / Madam

I am writing to voice my support for the State of Massachusetts to use the internationally accepted electronic document format, the Open Document Format as opposed to the Microsoft OpenXML format.

The Open Document Format (ODF) is non commercial has been endorsed by ISO and does not favor any organization at the expense of another. Furthermore the ODF guarantees access which makes it ideal for archiving documents, something which is critically important to government agencies.

The same cannot be said for Microsoft's OpenXML format. Microsoft is a commercial organization who have in the past faced legal proceedings for its actions which amount to being monopolistic. I would recommend extreme caution in endorsing any format introduced by Microsoft and call for independent expertise on assessing OpenXML and whether it conforms to the same standards as the Open Document Format.

Yours faithfully

Michael Tasseron

From: [Andrew MacKenzie](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Document Formats.
Date: Saturday, July 14, 2007 8:49:50 AM
Attachments: [ATT00004.dat](#)

To whom it may concern,

The state originally did a wonderful job in specifying criteria for what was needed in a file-format for documents, and then applied that criteria to the available formats and decided upon ODF.

Now I hear the state is again considering Microsoft's OOXML even though Microsoft has refused to make any changes that would be necessary for OOXML to fit the aforementioned criteria.

I don't care what applications the state determines are necessary (open source or closed), but the document format used should be open to include all citizens using whatever software they desire!

Please keep the original very good decision to use ODF going forward. Remember, the customer specifies the requirements, make the vendors meet your requirements!

--

// Andrew MacKenzie | <http://www.edespot.com>

// GPG public key: <http://www.edespot.com/~amackenz/public.key>

// It is easy to find fault, if one has that disposition. There was once a man
// who, not being able to find any other fault with his coal, complained that
// there were too many prehistoric toads in it.

// -- Mark Twain, "Pudd'nhead Wilson's Calendar"

From: [Chris Clark](#)
To: [Standards \(ITD\)](#);
CC: ["Pamela Jones"](#);
Subject: A UK Company view Why Massachusetts State should flatly reject MS OOXML
Date: Saturday, July 14, 2007 7:37:51 AM
Attachments:

A UK Company view Why Massachusetts State should flatly reject MS OOXML

Dear Sirs,

We are a UK Marketing Agency who are concerned just as much about data and format preservation, and the free flow and availability of information as the State of Massachusetts – it's a problem without borders for all of us and we very much share your concerns.

Our systems, software, product offerings, e-commerce websites and client documentation all depend heavily on, or are used in systems with the long established HTML and ISO/IEC XML 26300 standards – it was the universality of these standards that dramatically brought the World Wide Web into being. As your State brings more and more information to your people, you will have the same concerns.

We are deeply concerned, period, at Microsoft's continuing attempts to push a second standard, OOXML, on our industry, and in fact their much published business actions generally. Whilst your technical teams have all the deeply technical assessments and opinions to hand, this is what we see in the UK and are very concerned about.

Above the file format debates, the reality at the application level as it stands today, is website copy generated, saved, and displayed in Microsoft Word is incompatible with websites. We need to work with information flow without borders – by this, to enable information to flow freely from desktop to web to server to desktop, managed by a wide range of applications and programs. Every website developer and TypePad, Blogger, or Wordpress user who receives Microsoft saved copy routinely uses conventional copy and paste, then employs an inbuilt de-tagging utility supplied in the software to remove hidden Microsoft

formatting tags to make the copy web-compatible.

This problem will also be well known to your Web Administrators, pushing up significantly Massachusetts information distribution costs as it does with our business.

However, today, the problem has worsened. The web utilities no longer catch all the Microsoft hidden tags. The formatting is destroyed, the web editors stop working risking the website code, and copy often has to be scrapped and redrafted from hand. Even today, word Document (.doc/.dot) binaries have to be converted to be readable as .odt .txt. or .rtf binary then loaded in a web editor. It appears to us that .docx type documents underpinned by MS OOXML with low quality converters makes the problem significantly worse. Data preservation is lost, and transcription errors often creep in. Frictionless flow of information stops for us if even today's .doc saved documents are used, and considerable time is spent re-vetting approved copy for new errors.

Our second major concern seemingly confirmed by Microsoft is the scrambling of mathematical formula. This is the reference:

http://blogs.msdn.com/brian_jones/archive/2007/07/12/spreadsheet-formula-bugs.aspx

This will affect international shopping cart rules files if conversion between spreadsheets that cross OOXML conversion produce error numbers. This is hard enough to get right today, but the thought that mixes, volumes, and units might all get errored would create nightmare professional liabilities for my business, and administration risks to your State.

This simply does not apply if the copy is in OpenOffice document or spreadsheet formats – copy and presentation is maintained in document and web, via cut and paste, and also by downloading, transmitting, and uploading documents using these open binaries. Neither does the problem arise when dealing with copy either via XML supported formats or cut and paste methods presented to us from or via the web. Our issue is shopping carts – but your concern could be in life affecting medical and benefits services.

With OOXML, and I am not an expert, it appears to us this 'standard' causes significant additional problems, and seemingly by design. I have read with alarm the inadequate converter stories and supporting screen

shots, formulae representation disagreements within the Word documents, and the confirmations just this week by Microsoft that mathematical formulae are wrongly represented. We have rising concerns about accepting documents created within from Office 2007.

Microsoft have successfully make software for Governments and Industries worldwide. In our view there is a simple answer to this that would benefit everyone. With your help, Microsoft should be flatly required to drop OOXML, and just simply adopt the current ISO/IEC 26300 XML standard in use by the world outside the desktop application suites.

We are of course a very different organisation to you, but both have identical borderless and free flowing data format and preservation problems. We would call upon you as we are also doing in the UK to insist that Microsoft drop this 'standard', and work within the frictionless and borderless information free flow world we absolutely depend on today, underpinned by the truly open and approved ISO/IEC 26300 XML Standard.

Yours faithfully

Chris Clark
Managing Director
Clark Marketing Ltd – London - UK

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contact us today at www.clarkmarketing.co.uk | privacy policy at www.clarkmarketing.biz/html/privacy_policy.html

From: [Lee Braiden](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Comments on your "Open Standards" adoption
Date: Saturday, July 14, 2007 6:11:58 AM
Attachments:

Hi,

I understand that Massachusetts is now considering Microsoft's so-called "OpenXML" format as an open document storage standard. I would like to voice my concern about this, and to re-iterate support for the original approach to this issue, which was championed by Peter Quinn.

First of all, Microsoft's "OpenXML" format is NOT Open, in any true sense. For an explanation of this, you only have to refer to Peter Quinn's original stance. When asked about his willingness to look at formats other than ODF, Peter stated that any other format considered would need to be **developed** as a standard, and not simply declared a standard at a single point in time. Any revisions to that standard should only be made after public review, and similar due process. In contrast, Microsoft is known to ignore standards in ways that makes it impossible for others to implement the same standard -- in other words, they change the rules, using their monopoly so that they can continue to dominate the marketplace.

This is a pattern that has been seen over and over again with Microsoft. The US Antitrust case against Microsoft was a battle about a similar issue -- and a costly similar mistake by government in accepting Microsoft's non-standard products. Microsoft has now delayed and undermined and offered minimal compliance with that court process in such a way that the case has now expired, with virtually no consequences for Microsoft. Their unfair practices have continued, and another case is now being brought against Microsoft by Google, with similarly little hope of success. Likewise, cases have been or are being brought against Microsoft in France, Europe itself, and, if I recall correctly, at least one other country at this moment in time.

In short, Microsoft cannot be trusted to create and maintain a standard. They

have shown themselves time and time again to represent the antithesis of standardisation. Any standard -- PARTICULARLY a business document standard -- MUST be managed by an independent body.

It was undoubtedly Peter Quinn's clarity on this issue -- that checks and balances of the standard itself were needed to ensure a proper solution -- that threatened Microsoft's (greatly undeserved) monopoly over document storage. Threatened as it SHOULD, I might add, as Microsoft's approach does not serve the public, as a public body's document storage should. Microsoft play hardball when an issue could lose them millions of dollars, and that is precisely why his job was jeopardised. Make no mistake about that.

When Peter Quinn lost his job over this, I saw for the first time just how corruption works in the west. It is not so blatant and obvious as it may be in, say, a small village in China, but it is real, and it must be fought by people of integrity and vision, who can take up the banner when others have done all they can. Peter did all he could, and thankfully, he landed on his feet --- largely because he showed I.T. insight and understanding as well a willingness to do things properly, I am sure. I will be deeply saddened if Microsoft win by besmirching a good man's name, and waiting for people with less understanding to miss the point in his stead.

I would invite you to revisit Peter's comments on the need of a format which is developed publically, and will not be arbitrarily modified or extended by companies who implement it in any given product, such as Microsoft in their Microsoft Office product.

In addition to not being Open, the so-called OpenXML format, is not, in any useful sense, XML. Yes, you read that correctly. This is why "OpenXML" is such an insult to those many companies who have worked so diligently to create a true standard, in the shape of Open Document Format (ODF).

XML is intended to be a readable markup language, much like HTML. Here is some HTML:

<p>

This is a paragraph of text.

This sentence is strongly emphasised (which is usually shown in bold).

This sentence is emphasised, which is normally shown in italics.

</p>

Note that paragraphs are marked noticeably and UNDERSTANDABLY, with a simple "<p>" and "</p>" tag-pair. Likewise, the words which should be shown with emphasis are marked with understandable "em" or "strong" tags. The format is simple, and makes a lot of sense. THIS is how good XML is done.

Likewise, the ODF standard is simple and readable. It does use the slightly more verbose category:tagname format of XML, but this is entirely standard, and well understood. Here is some standard, Open Document Format text*:

```
<text:p text:style-name="Standard">
  This is a
  <text:span text:style-name="T1">very basic</text:span>
  document
  <text:span text:style-name="T2">with some</text:span>
  formatting, and a
  <text:a xlink:href="http://example.com">hyperlink</text:a>
</text:p>
```

It's a little long-winded, admittedly, but this is the price you pay for XML's flexibility. The important point is that it makes SENSE, and is not UNNECESSARILY complex.

By contrast, Microsoft's so-called "OpenXML" format is neither sensible, nor simple. In fact, it has been said (by people smarter than me) that the format looks like a dump of the computer's own internal format, as used within Microsoft Office. This is not how standards are made. That's like designing a driving standard by copying every movement of a driver, including their mistakes, and telling everyone else to move exactly the same way.

Microsoft's so-called "OpenXML" looks like this*:

```
<w:p>
  <w:r>
    <w:t>This is a </w:t>
  </w:r>
  <w:r>
    <w:rPr>
```

```
<w:b />
</w:rPr>
<w:t>very basic</w:t>
</w:r>
<w:r>
  <w:t> document </w:t>
</w:r>
<w:r>
  <w:rPr>
    <w:i />
  </w:rPr>
  <w:t>with some</w:t>
</w:r>
<w:r>
  <w:t> formatting, and a </w:t>
</w:r>
<w:hyperlink w:rel="rId4" w:history="1">
  <w:r>
    <w:rPr>
      <w:rStyle w:val="Hyperlink" />
    </w:rPr>
    <w:t>hyperlink</w:t>
  </w:r>
</w:hyperlink>
</w:p>
```

The difference is clear. Anyone who accepts this as a standard, when it has not been approved by the ISO, and when it is clearly inferior to the already standardised, approved, and widely implemented OpenDocumentFormat (ODF), will be sadly either incompetent, or worse: corrupt.

Please do not believe that anyone will take it lying down. Your own citizens, large international companies like IBM, Apple, Arbor, and more, along with large international grass roots organisations, like the GNOME community, the KDE community, and still others... all of these people a lot to lose from many more years of monopolistic abuse by Microsoft. Microsoft can cause trouble, but the injustice of Microsoft's dominance will cause more, if left unchecked.

Massachusetts is at a crossroads. Please choose wisely, for the benefit of

your citizens, and the world as a whole.

* Taken from

http://opendocumentfellowship.org/introduction/odf_vs_oxml_part_II

--

Lee Braiden

<http://peacejournals.org>

We are not for names, nor men, nor titles of Government, nor are we for this party nor against the other but we are for justice and mercy and truth and peace and true freedom, that these may be exalted in our nation, and that goodness, righteousness, meekness, temperance, peace and unity with God, and with one another --- that these things may abound.

-- Edward Burroughs, 1659, 'Quaker Faith and Practice'

From: mail.comcast.net
To: [Standards \(ITD\)](#);
CC:
Subject: Open Document Format, ODF decision
Date: Saturday, July 14, 2007 6:08:02 AM
Attachments:

Hi,

Thank you for leading the way to a more open world where we can enjoy information beyond the next release cycle of new software with proprietary formats.

We cannot continue to re-buy information that is only available in proprietary formats. Any information that is encoded in unique formats is costly to re-format so that it can be usable in any system it is needed in. Hundred of Tera bytes of information that is needed to be searched on a certain topic may not be currently used, if a decision is needed before it can be converted. We are currently loosing our ability to avoid past mistakes by not having this information available to us all. In this the term cost takes on new meaning and significance.

We need to have a standard where we can search new as well as old archives of data in electronic format to avoid making repeated mistakes in our history. Our history has shown that the quickest route to the abuse of power by any authority is to control the information. That information even though it is freely available to the public is useless if it is not in a format the is universally available to us all.

You may be familiar with interviews conducted with living witnesses of past historical events. I am fascinated that we have these documents and I am also sad that once these people are gone that the information is gone as well. As each generation leaves us, the current is that much diminished. Our "information age" is false if we are still only limited to what we can currently access. We are loosing our history as a nation and as a people... We are leaving ourselves open to abuse of power that was originally given by the people. Your state is again showing the way as you did by being one of the original thirteen.

I thank you for taking the first steps to allowing all of us to be a better nation and a people.

Fritz G. Cage

P.S. I am composing this due to an article on Groklaw, they are also interested in freedom of the people, and concerned with issues that will affect our nation. I read with interest and concern that both are being purchased by special interests.

I do not think that our founding fathers meant that businesses and minor special groups qualify as a "citizen" to be represented in the house of representatives, congress or our constitution. Their "interest" is not in the best interest of our nation.

From: [John Allen](#)
To: [Standards \(ITD\)](#);
CC:
Subject: OOXML vs ODF
Date: Saturday, July 14, 2007 6:07:07 AM
Attachments:

Dear Standards Team,

I've been following with interest the debate over whether you allow OOXML as an alternative standard to ODF. Sadly in my country (UK) the government isn't even allowing any discussion but seems determined to standardise on a Microsoft-only infrastructure.

Other countries, eg France, Italy & Japan, are moving towards open source IT infrastructures which won't tie them to the products of a single company.

I think that allowing OOXML as an alternative standard will just perpetuate the status quo, ie people will use Microsoft products because they conform to the standard: no need for consideration of any other products.

Recently the British Library has announced a joint project with Microsoft to preserve all its documents in open digital formats. Naturally the open formats will be those that Microsoft has produced. However who knows whether Microsoft will still exist in 50 years time?

If Microsoft were to fold who would be able to explain the less well documented features of OOXML such as this: "useWord97LineBreakRules".

Apologies if you feel that a Brit shouldn't poke his nose into this debate but I think it will be a sad day if you admit OOXML as an open standard.

Kind regards,

John Allen

From: [Ken Papp](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Public Comment on ETRM Draft 4.0
Date: Saturday, July 14, 2007 3:42:43 AM
Attachments:

Information Technology Division
Commonwealth of Massachusetts
Attention: Beth Ann Pepoli

Re: Public Comment on ETRM Draft 4.0

Dear Ms. Pepoli,

As someone who works with resurrecting legacy data, metadata, and databases for a state agency, I can't stress enough the importance of archiving data, documents, etc. in non-proprietary formats. I recommend reviewing another very informative article on the importance of the OpenDocument Format and the lies about the "openness" of Microsoft's proprietary XML format by David A. Wheeler, entitled [Why OpenDocument Won](#) (and Microsoft Office Open XML Didn't).

I feel really bad for the governments and businesses who have decided to go with Microsoft. Little do they know that the reduced prices offered by Microsoft now will be worth less than the little cardboard roll that Bill Gates throws away after he's done using the last square of toilet paper at his retirement party, because no one will be able to read those archived documents in the future. Microsoft may still be around, but will there be any software available that could read it? Have you (or your workplace) recently thought about the possibility that your archived documents won't even be readable 5 or 20 years from now because you are using proprietary document formats today? I can't even get a coworker to properly read my Microsoft OfficeXP (2002) Word document and she's using Office 2003! Smart computer users should seriously consider saving important formatted documents in ODF or "the real XML" using the free, non-proprietary [OpenOffice.org](#) office suite, less critical documents as ASCII text and/or PDF or Postscript. It comes down to this; Microsoft's "open" XML format is just another ".doc" in

disguise. I urge the ITD to not include Ecma 376 on its approved list. Thank you for your time.

With regards,
Ken Papp

--

"What's another word for thesaurus?" -- Steven Wright

From: [Cliff Bamford](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Public Comment on ETRM Draft 4.0
Date: Saturday, July 14, 2007 3:33:16 AM
Attachments:

Information Technology Division
Commonwealth of Massachusetts
Attention: Ms. Beth Pepoli

Re: Public Comment on ETRM Draft 4.0

Ms. Pepoli

I retired from Microsoft in 1998, as Principal Architect for Internet Operations. I was employed at the company for 8 years, and still hold a substantial amount of MSFT stock. I attended Harvard's Management Science institute, and have spent many years in Massachusetts in other roles. I have experience in standards development -- at the ISO, IETF and ANSI/NIST standards bodies, among others.

I have also been involved with Internet development since 1972. The Internet owes its success to open, vendor-neutral processes which quickly selected a "winner" among competing candidate standards --- and then stuck to that winner. The Internet's success is a clear endorsement of the value of unitary standards in a multi-vendor environment.

I saddens me to say that, in my opinion, Microsoft is NOT serving the interests of the Commonwealth, nor of the world's IT community, by trying to establish OOXML (ECMA 376) as an alternative to ODF (ISO 26300).

Specifically, Microsoft's suggestion that users should have "choice" between competing standards is specious and self-serving. Choice is great when it brings users the benefits of competition in the form of better alternatives and products. However, in the context of Draft 4.0, "choice" between two duplicative standards will have exactly the opposite effect.

To see this, imagine a future in which ECMA had not granted Standards status to OOXML, and the Commonwealth had adopted ODF as the sole approved format for government documents. The millions of files currently stored in Microsoft Office binary formats can already be read and re-written in ODF

format, by several existing applications, with high fidelity. Over time, the government's Office binary files would migrate to ODF -- without licensing or intellectual property hindrances. That collection of ODF documents would in all likelihood become the commodity of a new market -- in which a multitude of vendors could develop ODF-based applications that truly increased competition. Those new vendors would be assured of having a commodity -- a largish corpus of ODF documents --- over which to compete.

In contrast, if ITD adopts OOXML as an approved alternative to ODF, there is very little likelihood that any vendors other than Microsoft would actually implement it's 6,000-page specification (in fact, doing so is impossible since, even at 6,000 pages, OOXML's ECMA 376 is incomplete). So, although some Commonwealth documents might change from Office binary to OOXML, that would be a distinction without a difference --- the OOXML documents would not form a market, because there would only be one player in it: Microsoft. Other vendors would be disinclined to participate, given Microsoft's overwhelming lead (and continued indirect control of the OOXML ECMA 376 standard itself).

There are a large number of additional technical objections to OOXML available at http://www.grokdoc.net/index.php/EOOXML_objections -- I won't repeat them here.

The ITD and the Commonwealth have shown great wisdom and courage in their recognition of the benefits of open standards for electronic document retention. I am embarrassed by the anti-competitive actions of my once-great previous employer in derailing that process, and I hope that ITD rejects the notion that duplicative standards accomplish anything except tilting the playing field in favor of a single vendor.

Sincerely

Cliff Bamford

From: [Stefan Schwarzburg](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Standards and Microsofts OfficeOpenXML
Date: Saturday, July 14, 2007 2:56:49 AM
Attachments:

Please do not allow document formats that contain binary and undocumented parts to satisfy your criteria of open standards.

Therefore please do not allow Microsoft's OfficeOpen XML. It is definitely not an open standard.

With best regards,

Stefan Schwarzburg

From: [Daryl Yager](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ODF vs. Microsoft proprietary standards
Date: Saturday, July 14, 2007 1:44:34 AM
Attachments:

Please revise the Massachusetts policies that have been recently enacted. These standards would lock the state and its citizens into Microsoft's proprietary document formats. This is akin to only permitting certain brands of cars to use the highways, and would paint the state of Massachusetts in the role of endorsing and even requiring Microsoft products in order to manipulate state information containers such as documents, spreadsheets, and other means of transferring information.

Using the metaphor of a highway system, we see that an enormous variety of vehicles is able to use the highway system, limited only by governmental restrictions, primarily in the interest of public safety. In this metaphor, vehicles correspond to the "containers" with which we process our information. No one company maintains our highway system, but many compete to maintain the *standardized* highway system. This effectively keeps any one company from gaining control and profiting excessively through disproportionate influence and/or control.

Microsoft's primary critical function as defined by our Western monetary system is to expand and profit in whatever arena it chooses. By allowing Microsoft to dominate and possibly control the apparatus by which our governments and citizens exchange vital information, you are compromising the freedom of the American public. Furthermore, no matter what assurances are made by Microsoft, they will seize every opportunity to control and profit in every venture they pursue. If Microsoft was genuinely altruistic in the document format situations, they would not be fighting so hard to ensure their standards were adopted by the state of Massachusetts.

Finally, please be reminded that international organizations, including the ISO and IEEC have endorsed non-proprietary standards for information exchange. There are truly free protocols that will stand the test of time, without any current or

future stipulations that Microsoft or any other profit-focused enterprise could capriciously enforce. This is the path that our government should pursue, to ensure that information that should be freely available to citizens be available without the taint of proprietary standards.

A Concerned American Citizen

<<signed>>

Daryl Yager

--

Daryl Yager

cell (808) 728-9852

From: [Gerald D. Neale](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open standards are the best way
Date: Saturday, July 14, 2007 12:49:39 AM
Attachments:

If you utilize closed standards you give up the ability to complain to vendors because you are locked into what they sold you, the closed standard. Open standards offer flexibility in this situation and so many others. In the short term it's hard to see the importance of that, but in the long term it's the best way to ensure survival.

Jerry
<http://chlug.org>

No need to miss a message. Get email on-the-go with Yahoo! Mail for Mobile. Get started.
<http://mobile.yahoo.com/mail>

From: [Michael Vogt](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Please say no to the Office Open XML format.
Date: Saturday, July 14, 2007 12:17:48 AM
Attachments:

Hello to all in Massachusetts considering document formats for state government,

I urge you to look closely at the Office Open XML format, and see how it will merely perpetuate the current troubles we already have with current Microsoft document formats. People more knowledgeable than I have already spoken very well about how Microsoft's Office Open XML format has innumerable problems. It forces one to interpret dates incorrectly, purely for Microsoft backward compatibility, which has no place in an open standard and is just plain silly. Microsoft's latest format has XML that fairs very poorly as a human readable format, which is truly the main point of XML. They've also reinvented the wheel in many areas where an established format has been in use for years, such as their avoidance of using SVG for scalable graphics. Then the licensing forbids other vendors to implement features that aren't listed in the current documentation. This means that Microsoft can simply add new "features" into the format, and ensure that nobody else can implement those "features" thereby ensuring that Microsoft products are the only ones that can completely preserve formatting. If Microsoft products will be the only ones that can fully read the documents, why bother with any open standard at all? You can read more across the web, including a very short letter here:

<http://www.consortiuminfo.org/standardsblog/article.php?story=20070709085538784>

I'm not simply an anti-Microsoft person, either. If you want to use their products, that's understandable, though it's best to know what you should expect from their products. I can see many programs where Microsoft does well, such as OneNote and Excel. But if your goal is to have a format that's an open standard and all the benefits that come from open standards, such as true interoperability, a complete avoidance

of vendor lockin, a format that can dependably be read in the future, and multiple competing, yet compatible, products, you will not get that from Microsoft's newest format. The only format that can deliver the goods in this area at this time is the OpenDocument Format, which already has multiple implementations.

Please help us move into the future where end users don't need to worry about something as arcane as file formats! I work at a church at the moment, and it seems that we can only dream of the day when one can send a document to someone else and trust that it's as easy to view as a web page that's written in standards-compliant HTML. Until we use ODF as we currently use HTML and XHTML, that day will never come, and we'll be stuck in a loop of people continually confused as to why someone else can't read their documents.

Sincerely,
Michael Vogt

From: [Robert Withrow](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Concerns about ECMA 376
Date: Friday, July 13, 2007 11:27:20 PM
Attachments:

I believe that the state of Massachusetts should /not/ approve ECMA 376 (aka OOXML) as an open standard.

Using my experiences as a past chairman of an ITU-T Focus group, I have serious concerns about incorrect or flawed processes that have been used by ECMA in the processing of this standard. In addition I believe there serious structural problems with this standard that would prevent it from ever functioning as an open standard.

At the very least, this proposal should be required to go through /standard/ processing, and all of the substantial objections that have been raised should be properly processed.

From: [Kevin Dupuy](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Your proposed addition of Microsoft's OpenXML format as usable standard...
Date: Friday, July 13, 2007 10:21:39 PM
Attachments:

Hello. My name is Kevin Dupuy, and I am writing in regarding the state's proposed acceptance of Microsoft's proprietary OpenXML document format as a usable standard. I would like to enter my comments into the fray.

I would like to introduce myself and give your dept. an overview of my background. I am not a professional in the tech field, instead using tech is my hobby. I currently run Ubuntu Linux on my laptop. I am a strong proponent of open standards being adopted by governments.

The reason adaptation of open standards by governments is a good, and indeed necessary thing is this: if a government creates a file today, they need to be able to open that file and make changes to it 15 years down the road. That is possible with physical items such as pen and paper, but that is being threatened in today's high tech world with proprietary formats. Microsoft is the prime example of a proprietary company. While OpenXML might be freer, it is still not free. If Microsoft wants, they could replace OpenXML with a new format for saving documents in Microsoft Office tomorrow. They are free to do that. They could then attempt to sell the state a translator for more money in order to read the documents that the state has saved.

With other open standards, such as the industry recognized standard Open Document format, that is not possible. Open Document (ODF) is controlled by a non-profit group which is sponsored by many different corporations and used by many others. IN the latest version of the open source and free of cost office suite, the largest competitor to Microsoft Office, OpenOffice 2, uses the format for document saving. In contrast, OpenOffice is unable to read or write OpenXML files, meaning that the state is unable to move to different office suites. In fact, two companies attempted to gain access to a translator by going directly to

Microsoft, those two companies being Provo, Utah based Novell, parent company of the popular enterprise Linux vendor, SUSE Linux; and Linspire, which makes a Linux product for home users, both had to sign a 'patent and collaboration deal' that rescinds the freedom of the translator.

From: [spark](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Massachusetts Open Format
Date: Friday, July 13, 2007 10:12:43 PM
Attachments:

Sir:

Please do not accept the closed binary document format proposed by Microsoft as the Massachusetts Open Format. There should be one standard and it should be the one developed under pure open standards with no hidden parts that may be altered or removed by the "owner" of the standard. Microsoft could and can claim certain rights over their developed document formats. I don't think that "the peoples" documents, their government documents, should be in a format encumbered by patents held by a sole source provider when there is a proven, workable, open, unencumbered format available.

There is no need for two standards and not only is there no need but to have two standards for the same basic thing usually ends up costing everyone more. There are many real world examples of where this is true. You may need various kinds of light bulbs for various illumination needs, but you don't need various kinds of light bulb bases. If you buy a screw in light bulb for a table lamp it should not entail deciphering the thread type of screw in basic light bulbs. This is needless complexity that offers no benefit in functionality. The wattage ,color of the bulb provides the option to change the light from the lamp from dim to bright and white light to red, yet the thread types of bulb bases offer nothing in kind. The market does not need Microsoft ODF and pure ODF any more than it needs all the different types of basic light bulb bases. Worldwide there are two standards of electrical power and plug sizes, one of which necessitates a converter to work in the other system, as is the case in European and American power plugs. It is what it is now, yet if one had foresight that could have been avoided. The travel radio / alarm clock only needs power, the necessity of a converter is extra cost to the radio and it doesn't improve the radio as a radio. One would not choose to build to such different basic electrical socket and plug specifications were it possible to start over, unless one was the supplier of power plug converters that is. You have the ability to choose to not repeat those same type of errors in the realm of document standards. You can choose

the one standard that everyone can freely use without encumbrances and that does not need any converter to work.

Please keep the "peoples" documents in a single, free, non proprietary format and reject the proposed MS-XML standard in favor of the true open ODF standard.

Mark Johnson

From: [Jordan McCollum](#)
To: [Standards \(ITD\)](#);
CC:
Subject: OOMXL Standard Proposal
Date: Friday, July 13, 2007 10:11:47 PM
Attachments:

I would like to voice my opinion as to NOT adopt Microsoft's OOMXL as a Standard for ANY state of the United States. For a very long time "standards" were accepted as the normal that everyone can count on, and even improve on; implying that while being protected intellectual property, it was also subject to improvements by people OTHER than the intellectual property owner. With this as a backdrop, is it proper to have a "Standard" that does not work with anything else, where only the intellectual property owner has the ONLY tool for the job? I do not believe that it is.

There is one other opinion I have. Microsoft is already losing ground to other companies and has been trying very hard to strengthen its hold in the industry. Microsoft has even lowered itself to false accusations and threats, which it has done in the past in order to scare users into buying more products than necessary. If Microsoft is allowed to become a "standard" anywhere, then that just strengthens their grasps on the users, where they can then pull as much money as they want.

Without trying to suggest this, but adopting OOXML would be the same as declaring General Motors the "standard" of automobiles.

With these thoughts in mind, I ask: Why adopt a so-called "standard" where the users will have to pay extravagant prices and/or fees for software to USE a "standard" when there is an option available for no cost, that can be easily adopted and modified?

If a "standard" is needed, look to the Open Source Community; they are more concerned with function than profits.

From: [Brian Showalter](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please reject the inclusion of OOXML (Ecma-376) in the ITD list of approved standards
Date: Friday, July 13, 2007 9:57:05 PM
Attachments:

To whom it may concern,

I am writing to express my opposition to the proposal for the Commonwealth of Massachusetts to include Microsoft's Office Open XML document format in the list of ITD approved formats. A so-called standard that is not implementable by anyone except the vendor due to attributes such as "useWord97LineBreakRules" that include no further specification is no real standard at all. I urge you to stand up for what is in the best long-term interest of your citizens, and not bend to the influence of a single vendor that has a vested interest in promoting its own self-serving document format rather than one such as Open Document Format, which was cooperatively developed for the benefit of all to use freely.

Sincerely,
Brian Showalter

From: [richard kim](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Do not approve OOXML format
Date: Friday, July 13, 2007 9:51:02 PM
Attachments:

Let's be honest. OOXML is meant to keep Microsoft in control. They are the only ones who control the "standard." A standard should be controlled by many parties, not just one. I understand they need to do everything they can to maintain control and keep the cash flowing. Please, vote for the good of the state. Let's keep odf, and welcome Microsoft to join and change it as needed, because Microsoft will not let others join in and change the OOXML.

Richard Kim

From: [Jim Coleman](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Still time to undo a mistake
Date: Friday, July 13, 2007 9:50:59 PM
Attachments:

I'm a resident of West Virginia but when I read about Massachusetts' original quest to demand a true open standard for its official documents, I wrote the officials of my own state, begging them to do the same.

Both West Virginia and Massachusetts were smart enough to, initially, stand up to Microsoft during the infamous scuffle over their monopolistic abuses. Both states have long settled but Massachusetts, alone, seemed to have learned the lessons of that battle. The Commonwealth seemed to understand that you cannot build a monopoly over night. With the ODF push, Massachusetts seemed to 'get it'.

Microsoft has always used all available leverage to have their way. The streets of the IT industry are littered with the corpses of businesses and individuals who got in their way. They do not and have not ever played fair.

Microsoft does not ever intend to give a rival even the smallest foothold into markets they've claimed for their own. They've proven time and again that nothing, not even their customers' best interests, is more important than market share.

Open XML is a sham, a smoke screen, a lie. There's nothing 'open' about it. It's impossible to imagine that Microsoft will ever allow ODF room to compete if both should be adopted. Interoperability will be still born. When the dust settles, only their 'standard' will remain.

Massachusetts has a chance to make word processing as universal a format as HTML. It has, perhaps, this one opportunity to take its document future into its own hands.

It's easy to see the right path and others will follow if you have the integrity to lead.

Sincerely,

Jim
ACHS '71

Upsala '75

<http://www.upsala.org>

<http://www.flickr.com/photos/jecoleman>

<http://www.flickr.com/photos/upsalacollege>

Check out the NEW Upsala Message Board:

<http://upsala.ning.com/index.php>

Sick sense of humor? Visit Yahoo! TV's
Comedy with an Edge to see what's on, when.

<http://tv.yahoo.com/collections/222>

From: [andrew at predoehl.net](mailto:andrew@predoehl.net)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF better than OfficeOpenXML
Date: Friday, July 13, 2007 9:49:59 PM
Attachments:

Dear Standards-setters of Massachusetts:

I am writing to ask you not to add "OfficeOpen XML" as an acceptable file format for state documents. There are a number of reasons why.

The main reason is that the specification document for OfficeOpen XML is essentially unusable to those outside of Microsoft. The specification does not fully detail many important aspects of the computer file contents. Instead the specification describes its operations with shortcut phrases like "perform word-breaking according to Microsoft Word 95 rules." However, only Microsoft knows what those rules are, and has not published them: any non-Microsoft programmer will be stymied. The net effect is that the specification is not truly open (despite its name).

One day in the future, it is possible that the details of all those shortcuts will be lost -- suppose an accident happens at a Microsoft data center, or all the relevant programmers retire. Unless the file specifications are fully spelled out in a widely-published, openly available format, then anyone holding "OOXML" files might be stuck with unreadable data. This goes against the purpose of having an "open" format for official documents.

In short, the "open" of Microsoft's OfficeOpen XML format is a misnomer. The format is not open. I recommend that Massachusetts use ODF instead. The decision affects not only the commonwealth of Massachusetts, but will influence similar decisions across the country. It is very

important for posterity that Massachusetts "do the right thing" in this case and not swallow a Microsoft monopoly on their data.

Best regards,
Andrew Predoehl
825 E. 5th St. # 153B
Tucson, AZ 85719
(520) 695-2909

From: [Ed King](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF, vs "Open" XML
Date: Friday, July 13, 2007 9:09:30 PM
Attachments:

What is that old saying? 'If You Don't Stand for Something - You'll Fall For Anything'

Don't fall for ambiguous "open" standards.

A year or two ago when Massachusetts was often in the tech news because of the talk about moving to open standards, I would proudly forward those news articles to my boss, the Hamilton County TN Register of Deeds. Now that Massachusetts is renegeing, I'm ashamed.

Ed King
ex-Sr Programmer
Hamilton County, TN

From: [Field, Tom](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Ecma
Date: Friday, July 13, 2007 8:39:56 PM
Attachments:

Dear people,

This is the second email I've written to you on this issue.

Since I wrote the first email, Japan has adopted open standards rather than going to bed with Microsoft.

Heck, I'm not a Microsoft hater...it's just that I can't imagine why any organization would want to tie themselves into one vendor, which essentially is what Ecma is all about.

And, as a governmental organization, I think you owe it to your state's citizens to make a choice that will not limit their choices.

I honestly believe that the decision you're about to make is more important than the mistaken decision that we made years ago not to adopt metric. Our country is being hamstrung by our failure to adhere to evolving, international consensus-driven standards.

Years from now, the citizens of Massachusetts will either praise your foresight in keep the standards open, or they will curse at you for adopting the Ecma standard.

Real standards are not company-centric. Real standards do not depend on clumsy, multi-thousand page specs. Real standards should not be embraced

by the majority of the community that will be using them rather than being forced down the electorate's throats by politicians and lobbyists.

Do the right thing. We'll applaud. And so will your grandchildren.

Tom

From: [Joel Berman](#)
To: [Standards \(ITD\)](#);
CC:
Subject: OOXML and ODF Standards
Date: Friday, July 13, 2007 8:32:44 PM
Attachments:

I am a lifelong Massachusetts resident and voter and am currently employed by Red Hat in Westford Massachusetts. I previously worked for DEC, then Compaq, then HP and have a total of 35 years in the the computer industry.

I have followed with pride Massachusetts position in supporting open standards, and although dismayed at what happened to Peter Quinn, I still had hope that Massachusetts would do the right thing. With so much high tech in the area, and world class projects such as the MIT led One Laptop Per Child project as well as being the home of the Free Software Foundation I was sure that my General Court would seek expert help.

The difference between "standards" and "open standards" is major, and while we all have the need to preserve documents from the past, it makes no sense to propagate those proprietary or closed standards. Any Massachusetts resident for no money at all is able to procure and run software that works well with ODF. Anyone with the appropriate skills can create software and documents with no legal issues or licensing restrictions if ODF is chosen. With OOXML it is just not at all clear what happens to our archives in the future.

While it is necessary to read older documents, it is not necessary to forever create documents that do not follow open standards. I urge you to consider making ODF the standard of choice in our Commonwealth and taking measures to phase closed standard out over time.

Best regards,
Joel Berman
26 Bayberry Rd.
Groton, MA 01450
(978) 448-5211

From: [shane.d.vincent at us.army.mil](mailto:shane.d.vincent@us.army.mil)
To: [Standards \(ITD\)](#);
CC:
Subject: OfficeOpen XML
Date: Friday, July 13, 2007 8:23:02 PM
Attachments:

Dear Committee Members,

I wish to thank you for opening up the discussion of whether or not more "standards" would make sense. I will opine that it does not.

Just as it's confusing to switch between the metric system and the english system of measurements, adopting multiple "standards" for documents means that you have no consistent standard. The argument that to preserve 100% consistency with obsolete software does not make much sense, and isn't even true of the OfficeOpenXML standard.

The ODF standard is a standard that is not owned or created by one vendor, but rather created in the open, with input from the public, it is a workable standard, and represents a forward looking approach to public records.

Having replaced many Microsoft Office XX installations with up to date Open Office installations, I believe that it is in the public interest to support the format that the public can use all the time without having to purchase software (I realize that to read OfficeOpenXML documents there might be a free version, but those are usually very frustrating for the average user).

Please consider having ODF as the one standard.

Thank you,
Shane Vincent

From: [R.B Skeoch](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Document Interobility PLEASE!
Date: Friday, July 13, 2007 7:59:57 PM
Attachments:

Re ERTM request for comment

Your inclusion of OOXML is a undermining of the objective for establishing a open document interchange standard.

Although we are not even resident in the USA,
Your ground breaking effort in 'enabling community'
are being watched as major step in removing large
corporation Monopoly lock in.

Why accept OOXML when it provides no additional
features that cannot be managed by ODF!

Please reconsider this back wood step.

--

Ron Skeoch
MD Muli Management P/L.
Project Risk, Accounts & Process Management.
www.muli.com.au
Phone 612 (02) 9487 3241
Fax 612 (02) 9487 3583

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From: [Raymond Ouellette](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ODF (ISO26300) and OOXML
Date: Friday, July 13, 2007 7:42:55 PM
Attachments: [signature.asc](#)

Québec, le 13 juillet 2007

Hi,

I'm not a resident of Massachusetts but an occasional visitor that really enjoy the White Mountains area for good hiking! Besides, I'm a strong user of open source OS and softwares since 1998.

The liberty, behind Open Source and Free Software (libre in french) makes me aware of the importance of standards for perennality, security and interoperability and how to avoid proprietary software and format locking.

I'm working for the government of Québec (Ministère de l'Éducation) and I was involved in the definition of different standards for our government (mostly standards for the world wide web). The choice of an office suite format was not yet discussed here in Québec. But it is with a strong interest that I follow the choice of the ODF format in Mass and how you will implement it as a possible example to follow by the other jurisprudence here in North America.

ISO26300 or ODF is already an international standard, the only one for an office suite. There shouldn't be 2 standards, it is illogical by definition. ODF is well documented and it works. Of course, it is perfectible and it will be as it's evolution is not locked down.

I really hope that Mass will stick to the initial choice of ODF as the only office suite standard. If you make this choice it will be also a good occasion for the other monopolistic office suite to FOLLOW an existing standard for security, interoperability and perennality of data and of file format, not to try to implement it's own standard with proprietary and closed parts inside it's pseudo free (as in liberty)

format.

Regards and best salutes from Québec!

Raymond Ouellette
démographe
Ville de Québec

--

Édité et transmis avec des logiciels libres sous Linux !

.....

Ce message comporte une signature électronique permettant de valider
l'intégrité de son contenu et d'en certifier l'émetteur.

Clef GPG/PGP: <http://www3.sympatico.ca/ray.ouellette/clef/>

Empreinte: 1350 6334 B9EE 3E10 CC84 1BF5 4A6D 5087 DBA8 7A10

.....

From: [wouter](#)
To: [Standards \(ITD\);](#)
CC:
Subject: one open standard
Date: Friday, July 13, 2007 6:30:57 PM
Attachments:

Hi there,

I am a technology-enthusiast from Belgium. I think it's wonderful to adopt open standards in your state. I would like you to point out that when you choose a standard, that it's a safe choice, according to me, that that standard is developed by an independent, not for profit, organization (support of several big and small industries is welcome of course). Full documentation would be also one of my concerns when choosing a format to save my data in. I am not in the position, at my job, to have that choice although I save my data at work in a open format. Whatever you choose I can only be grateful of putting open standards on the word-agenda.

Greetings Wouter.

oh and One and Standard go well together!

--

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From: [Paul Richards](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open document formats
Date: Friday, July 13, 2007 6:28:02 PM
Attachments:

Microsoft do not like open standards.
They do not like fair competition.
They will do whatever they can to get lock in to Microsoft products.

If you truly want an open standard, see what Microsoft is pushing,
then run from it as fast as you can
and choose the real open standard.

Regards
Paul

From: [Andrew Miller](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Document standards
Date: Friday, July 13, 2007 6:22:51 PM
Attachments:

Dear Sir/Madam,

I watch with interest you discussions concerning document standards. It seems to me that the use of OpenDocument standards is one of two choices at present, if you are looking to introduce a standard for compliance. The standard has credibility purely because it is not described/developed by a commercial player in the market. The second choice of course is ASCII text which is an actual standard and demonstrates all the qualities that you wish for your own circumstances.

The use of any other 'standard' sourced from an open, free or proprietary commercial site, e.g., OpenOffice's original format, OfficeOpen XML, DOC, RTF, WPD, etc, etc is unacceptable from this viewpoint as the control of the standard is then within the hands of organisations and individuals who may derive economic advantage from manipulation. Such future possible actions are anti-competitive. Let the commercial software interests compete on issues other than the access to and transferability of your data.

In the medical area where I work, there have already been examples of commercial entities refusing access to medical data until commercial fees are paid. This is clearly dangerous, and unacceptable, but also a forewarning of the potential problems of accumulating data in a commercial standard.

Dr Andrew Miller

--

AAM

From: [Owen Riddy](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF vs OOXML
Date: Friday, July 13, 2007 6:21:59 PM
Attachments:

Sirs,

I would strongly prefer to see state documents stored in an 'open' format that has support and backing from a number of independent experts and groups, rather than a questionable and untested format created by a company with a vested interest in a singular competing process that is not well known for accepting help from neutral or opposing vendors.

In short, I would prefer if the Open Document Format was regarded as a standard for governmental papers, and Microsoft's Open XML only considered after it has spent more time maturing, and been fully approved by the International Standards Organisation (ISO).

Owen

Get news, entertainment and everything you care about at Live.com. [Check it out!](#)

From: [Nathan Derksen](#)
To: [Standards \(ITD\);](#)
CC: [nderksen at nathanderksen.com;](mailto:nderksen@nathanderksen.com)
Subject: Comment on ODF vs MS Open XML
Date: Friday, July 13, 2007 5:18:56 PM
Attachments:

Hi, I understand that you are accepting comments from the public regarding the decision as to which document standard to accept. I would like to add my voice as a vote for ODF and strongly against Microsoft's Open XML specification.

I have reviewed Microsoft's Open XML spec, and it gives me grave concerns as to how feasible it will really be to have assurances that documents saved to this format will actually be readable 10, 50, or more years into the future, and I am concerned as to how anyone other than Microsoft will be able to effectively write converters that work correctly for the complete specification.

I have numerous concerns about the MS Open XML specification, two of which I am including here: it's lack of extensibility, and it's lack of implementation detail in the specification.

1) Lack of extensibility

The Open XML specification is designed to be locked-in to a specific implementation. For instance, elements like "autospaceLikeWord95", "useWord97LineBreakRules", and "truncateFontHeightsLikeWP6" are included as elements in the specification. These do not serve as building blocks that can be easily modified or added to, instead they are dead-ends which, once included in actual documents, must be forever considered in each translator that is developed. The more flexible approach would be to replace entries like "autospaceLikeWord95" with the set of spacing attributes which, when set to the correct values, achieve the same effect, but that can be readily modified to allow for many other types of spacings. That way any number of variations can be accommodated without having to enumerate them all.

Another example of lack of extensibility lies within its enumeration of graphic library elements. The specification gives lists of things like clip art graphics and

border graphics, but rather than providing for something like an attribute into which a reference to any image can be provided, they enumerate the complete list of MS Word library symbols, assumed to already be on the reader's system, and do not provide for custom symbols (ref: ST_Border in Markup Language Reference). Far better would be to provide an attribute into which any image can be referred to, and then have the image data included within the document itself such as through a base64 encoding encapsulated within an attachment tag. This is much more flexible, and also does not require translator developers to also have to potentially license Microsoft's image libraries.

2) Lack of implementation detail

The specification lacks the details required to implement many attributes. For instance, an attribute called "suppressTopSpacingWP" includes the following guidance:

"[Guidance: To faithfully replicate this behavior, applications must imitate the behavior of that application, which involves many possible behaviors and cannot be faithfully placed into narrative for this Office Open XML Standard. If applications wish to match this behavior, they must utilize and duplicate the output of those applications. It is recommended that applications not intentionally replicate this behavior as it was deprecated due to issues with its output, and is maintained only for compatibility with existing documents from that application. end guidance]"

This guidance appears in many places, provides no information, and requires a developer to get a running version of WordPerfect, an application which may not even run on current hardware/software, in order to implement the behaviour. I find it first of all amazing that they would include a deprecated detail into a new standard. In order to faithfully reproduce the specification, it is nonetheless important to implement these details, something which is a huge effort which can only be undertaken by entities with the substantial resources needed. This also highlights MS's fundamental approach of simply enumerating existing MS application behaviour rather than coming up with a standard which does not require this kind of implementation knowledge. It also reflects a built-in obsolescence, something which is not acceptable for a document standard that is supposed to keep its integrity for 50 years or more.

The effect of all this is that it will be difficult for anyone other than MS to write faithful translators, and so documents saved to Open XML will continue to be best viewed using MS Office products. I would hate to continue to see things like "autospaceLikeWord95" or ST_border attributes of "sombbrero" in documents 50 years to the future.

I hope that you consider these and other aspects of Microsoft's Open XML standard and reject it in favour of ODF.

Thank-you for your time.

Nathan

<http://www.nathanderksen.com>

From: [David Anderson](#)
To: [standards at state.ma.us;](#)
CC:
Subject: Microsoft OOXML
Date: Friday, July 13, 2007 4:41:08 PM
Attachments:

Dear sir/madam,

The inclusion of Microsoft's OfficeOpen XML (OOXML) specification for documents is confusing one very important point. OOXML is accepted by ECMA (ecma 376) as a specification. This does not make it a standard - as only the International Standards Organisation currently has that power.

There are several points to consider before allowing the OOXML into the process:

- The World Wide Web currently has a single standard - HTML - yet there are many vendors that produce web browsers and related products. Microsoft is one of these and to date the competition has proved healthy. This was only possible because of a single standard.
- Several companies are producing translators for OOXML, under the cloak of Non-Disclosure agreements (Novel and Linspire for example). Standards do not require NDA's, and indeed cannot coexist with them. OOXML, with its many hidden aspects, cannot therefore be a standard and will never be open to competition.
- A single *open* standard (such as the ISO Open Document Format) would encourage competition. A corporate controlled specification will not.
- Government is only as strong as the faith shown by those governed. In the IT sphere at least, the suspicion that a corporate body lobbied and paid for preferential treatment will erode that faith.

OOXML is not fit for purpose, will perpetuate the archiving nightmare, will stifle competition and innovation and open your government to the

suspicion of corruption. Think very carefully please.

David Anderson
IT Analyst for UK Government

From: [Paul Stauffer](#)
To: [Standards \(ITD\)](#);
CC:
Subject: oppose adoption of ECMA 376 / OOXML
Date: Friday, July 13, 2007 4:26:13 PM
Attachments:

Dear Sirs/Madams,

I am a concerned Massachusetts resident and taxpayer, writing to express my opposition to the proposed adoption of ECMA 376 (OOXML) as an additional standard alongside ISO/IEC 26300 (ODF).

I'll not get into all my specific objections, as I'm sure they've been covered by others before me. Suffice it to say that there are notable technical problems with OOXML, its status as a truly open standard is questionable at best, and that there is no compelling public interest served by adopting it as a second standard alongside ODF. The campaign for the adoption of OOXML in Massachusetts has been solely promoted by a particular corporate interest, and the success of that campaign serves no one's interest but theirs.

Please do Massachusetts the good service of rejecting OOXML.

best regards,
- Paul Stauffer

--

Paul Stauffer <paulds at bu.edu>
Manager of Research Computing
Computer Science Department
Boston University

From: [Richard Gorton](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Micro\$oft and "open" standardsn (OfficeOpen XML specification)
Date: Friday, July 13, 2007 4:01:22 PM
Attachments:

I am: Richard Gorton, Framingham, MA.

I urge you to apply the utmost level of paranoia and cynicism to any "proposal" by Microsoft.

To set the context:

Yes, I have made money off of Microsoft stock in the past (no holdings within the last 5 years)

Yes, I have been professionally shafted by Microsoft when work I was doing which competed with them reached their corporate (aka senior management) radar screen. And the company I worked for at the time caved in to every single "demand" to not compete. This was publicly described (in the NYTimes).

My point is that Micro\$oft has an entrenched, long running (since corporate inception) culture of embrace-extend-extinguish.

With a strong emphasis on "extinguish".

The decision making process has to assume that Microsoft is intending to lock out all competition as soon as possible.

Regards,

Richard Gorton
161 Temple St.
Framingham, MA
01701

From: [Don Folk](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please turn down "open" xml
Date: Friday, July 13, 2007 3:59:33 PM
Attachments:

I have been following this issue carefully. I urge you to turn down "open" xml as a state std. Accepting such a proposal is likely to bring harm to consumers and the computer industry.

I am a completely pro competition, let the market decide kind of person. But monopolies wreck industries, and harm their evolution.

I am concerned that some of the folks involved in this decision making process may have little knowledge of the computer industry. If history is any guide, Microsoft will use this standard to

- 1) Further entrench their monopoly
- 2) Try to harm competition
- 3) Create a situation that forces or encourages folks to buy products from MS, and discourages competing products

To support my position I offer 2 things

- 1) The judges comments toward the end of the anti trust trial
- 2) The judges comments 5 years after the anti trust trial, in which he essentially indicates the "remedy" applied to MS after they were found guilty as a predatory monopoly was essentially a failure- that they were continuing to act in the same fashion

I enclose a few quotes and links below

<http://www.albion.com/microsoft/findings-33.html>

Last comments in judges findings of fact

Most harmful of all is the message that Microsoft's actions have conveyed to every enterprise with the potential to innovate in the computer industry. Through its conduct toward Netscape, IBM, Compaq, Intel, and others, Microsoft has demonstrated that it will use its prodigious market power and immense profits to harm any firm that insists on pursuing initiatives that could intensify competition against one of Microsoft's core products. Microsoft's past success in hurting such companies and stifling innovation deters investment in technologies and businesses that exhibit the potential to threaten Microsoft. The ultimate result is that some innovations that would truly benefit consumers never occur for the sole reason that they do not coincide with Microsoft's self-interest.

http://blog.seattlepi.nwsourc.com/microsoft/archives/2005_06.html

Jackson: 'Nothing changed'

Thomas Penfield Jackson, the judge in Microsoft's U.S. antitrust trial, today defended his order to break up the company five years ago. CNet News reports on the former judge's comments during an [American Antitrust Institute](#) conference:

"Windows is an operating system monopoly, and the company's business strategy was to leverage Windows to achieve a comparable dominion of all software markets," Jackson said. "Nothing has changed, to my observation, in the five years that have elapsed since my decision ... Microsoft has won the browser war in the United States. Netscape Navigator, if it is still available at all, has only a small fraction of the browser market."

Update: Declan McCullagh, one of the CNet reporters who wrote the story, [posts](#) a response to Jackson's remarks from Jim Prendergast, executive director of Americans for Technology Leadership.

Update II: James Rowley of Bloomberg News has much more on Jackson's comments in [this story](#) from Wednesday's newspaper.

Posted by [Todd Bishop](#) at 10:54 AM ([Permalink](#)) | [Comments \(1\)](#)

http://seattlepi.nwsourc.com/business/229468_msftjackson22.html

Wednesday, June 22, 2005

Microsoft remains unrepentant, says antitrust judge

By JAMES ROWLEY
BLOOMBERG NEWS

Microsoft Corp. is still trying to "leverage" its Windows operating system monopoly to control all software markets, said the former judge who ordered the company's breakup in the U.S. government's landmark antitrust case.

"Nothing has changed, to my observation, in the five years that have elapsed since my decision," said Thomas Penfield Jackson, who retired last year as a federal judge. He said the settlement of the government's case hasn't diminished Microsoft's power in the marketplace or changed its business strategy of trying to expand its monopoly.

"Windows is an operating-system monopoly, and the company's business strategy was to leverage Windows to achieve a comparable dominion over all software markets," Jackson said yesterday in Washington at a conference sponsored by the American Antitrust Institute.

Jackson's 2000 decision ordered the breakup of Microsoft, but in 2001, a U. S. appeals court overturned that element, leaving the company intact. It

upheld his findings that Microsoft illegally protected its Windows monopoly for personal computer operating software by squelching competition from rival Netscape Communications Corp.'s Web browser.

The Bush administration, which inherited the case from the Clinton administration, settled with Microsoft once the company agreed to let computer makers promote rival software products.

Jackson defended his decision to grant the Clinton administration's request to break up the company. "The Microsoft persona I had been shown throughout the trial was one of militant defiance, unapologetic for its past behavior and determined to continue as before," he said.

Jackson said he "had no illusions that an order less drastic than that advocated by the government would meet with Microsoft's even grudging submission."

Jackson didn't criticize the settlement negotiated by the Bush administration, which drew objections from half the 19 states that had joined the Justice Department in suing Microsoft.

Still, he noted that Microsoft hasn't "fared so well in Europe." Antitrust enforcers ordered it to sell a Windows version without a music and video player and to grant competitors access to information on the operating system's inner workings.

"Microsoft has won the browser war in the United States," Jackson said, noting that Netscape's Navigator, now owned by Time Warner Inc., "has only a small fraction of the browser market."

Microsoft spokeswoman Stacy Drake said the company won't comment on the former judge's remarks.

Microsoft supporter Jim Prendergast disputed Jackson's description of the software industry. "Five years later, the industry has certainly been

competing as vigorously as ever," said Prendergast, president of Americans for Technology Leadership, a pro-Microsoft group. "You can run three or four different browsers that are widely available now on your laptop. The settlement was a much more reasonable approach" than Jackson's breakup remedy, he said.

The appeals court that overturned Jackson's breakup order also disqualified him from overseeing further proceedings in the case because he had granted interviews to reporters during the trial. In his speech, Jackson said the appeals court "concluded that my indiscretions in allowing two journalists to confer with me in chambers, off the record, during the trial disqualified me from presiding over further proceedings."

Writer Ken Auletta, who wrote a book about the Microsoft case, based in part on interviews with Jackson, quoted the judge as comparing Microsoft executives to members of a drug gang because of their unrepentant attitude in court.

The judge who replaced Jackson on the case, Colleen Kollar-Kotelly, rejected calls by the states for tougher antitrust remedies.

Jackson said the breakup would have promoted competition by creating a company that sold software applications, including Internet browsers and another that sold operating systems for computers.

"The rationale was to enable the divisions to compete -- the former for applications from independent software suppliers as well as with its now independent counterpart, and the counterpart to write applications for nascent operating systems that might someday offer worthy competition to Windows."

Jackson said he ordered the breakup without more hearings because each side would continue to produce "equally eminent experts" who "were in good faith in almost total disagreement about every issue in the case."

"Time, moreover, was on Microsoft's side," Jackson said. "Microsoft would continue to do what it had been doing until some court told it to stop. A remedies trial would postpone that indefinitely."

From: [James Rinkevich](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Adding OOXML (DIS 29500/ECMA-376) to open format standards
Date: Friday, July 13, 2007 2:44:37 PM
Attachments:

OOXML is an XML format that does not comply with the W3C XSLT standard(s). XSL Transform programs and programs that use the XSLT library will not be able to transform OOXML into other XML formats for use in XML databases, other office products (esp. those currently compatible with ODF (ISO 26300)), DocBook, XHMTL, etc. It appears that to use OOXML in a way that make it compatible with other XML formats it will need to be run through an ODF converter negating any advantages in using OOXML, thus there is no good technical reason to add it to the list.

From: [Harper Apted](#)
To: [Standards \(ITD\);](#)
CC: [PJ at groklaw.com; Zach Doppelt;](#)
Subject: Re: Public Comment on proposed ETRM Draft4 and Ecma 376 for inclusion as an open standard for Massachusetts
Date: Friday, July 13, 2007 2:39:57 PM
Attachments:

To Whom It May Concern:

It has come to my attention that Massachusetts' Information Technology Division is currently considering allowing Ecma 376, otherwise known as Microsoft's Office Open XML (OOXML), to be reviewed for use as an open standard by state government offices in addition to the already suggested Open Document Format (ODF). While I am not a citizen of the state of Massachusetts, I would like to point out that this decision will have far reaching effects on the rest of the Union (and the world) as to how electronic document formats and document standards may be regarded in relation to businesses and government policies.

The original announcement made by the ITD to only use or consider open standards became a catalyst for change in the technology world, helping individuals, organizations, communities and governments become aware of the importance of document accuracy, preservation and accessibility. To this day, governments and organizations around the world who are concerned about this issue continue to monitor the steps taken by Massachusetts during its implementation of this policy, as attested by the myriad articles and running commentary available online from a Google of "Massachusetts ODF" or the like.

I believe there are some potential issues you may or may not be aware of regarding this decision, and would like to offer the ITD some additional information relating to those issues by way of original published articles (see below).

In my opinion, in its current form OOXML should not be considered for inclusion to be approved for use as an open standard by Massachusetts, or any other government agency anywhere. Neither should it be considered appropriate for use by any agency, public or private, that is concerned with open implementation, computational accuracy, user accessibility, or long term document preservation.

I ask you to please consider, therefore, the words of those more educated and eloquent than I while you consider this important issue.

Sincerely,
Harper Apted
Network Manager
Warsaw Community Public Library
Warsaw, IN

The following are brief quotes from published articles regarding this issue, along with links to the original documents being quoted.

"A file format represents data. It stores data. It encodes data. These are all synonymous. But the ability to represent data is a trivial thing to do. ... although it [OOXML] can represent 100% of legacy documents, it does not specify how to do anything with them. Except at the level of a bit, the format does not express any structure or semantics."

"So what is the difference between representing and specifying? When you represent, it means that you can map from the features of the legacy format to the the new format. When you specify, it means that you provide the map, and enough detail so that others can read and write that same representation. That is a big difference.

Of course, OOXML is more than 1's and 0's. But when you see attributes with names like, "useWord97LineBreakRules," with no additional specification, then you know that the fix is in."

---"No Representation Without Specification" by Rob Weir

---Link: <http://tinyurl.com/2dwaa7> or original link: <http://www.robweir.com/blog/2007/06/no-representation-without-specification.html>

"Microsoft's refusal to release the specifications for its legacy file formats and/or its refusal to support the OpenDocument standard -- may conceivably become involved in antitrust cases, thus raising a need for JTC-1's heightened scrutiny of the Ecma 376 proposal."

---"Objections to JTC-1 Fast-Track Processing of the Ecma 376 Specification v. 0.1" - EOOXML objections

---Link: <http://tinyurl.com/yq7y85> or original link: http://www.grokdoc.net/index.php/EOOXML_objections

"There is already an ISO-approved standard, OpenDocument Format (ISO/IEC 26300), covering the same use as DIS 29500 [OOXML]. Having multiple *competing products* is a good thing; having *competing standards* adds cost to industry, government and citizens."

"DIS 29500 is too tied to proprietary products to be fully and completely implemented, without being liable to patent damages or patent license fees."

"DIS 29500 is too long (6000+ pages) and even at that length is not fully published; it contains both undocumented and under-specified elements that prevent full implementation."

"DIS 29500's complexity, extraordinary length, technical omissions and single-vendor dependencies combine to make alternative implementation legally and practically impossible. While DIS 29500/OOXML works extremely well with Microsoft products, its length, incomplete documentation and IPR restrictions violate the core principle of an international standard - being implementable by multiple vendors. "

---"DIS 29500 "Office Open XML" Fact Sheet" - ODF Alliance

---Link: <http://tinyurl.com/36nvtu> or original link: <http://www.odfalliance.org/resources/DIS%2029500-OOXML%20Fact%20Sheet.pdf>

"This paper presents the principal arguments on why DIS 29500 "Office Open

XML" (OOXML) is not an acceptable standard, as defined by recognized criteria. Though there are several hundred additional problems with OOXML (available upon request), this paper addresses just a few."

---"The Technical Case Against DIS 29500/OOXML" - ODF Alliance fact sheet opening statement to 5 page document addressing flaws of OOXML.

---Link: <http://tinyurl.com/2j2rmz> or original link: <http://www.odfalliance.org/resources/The%20Technical%20Case%20Against%20OOXML.pdf>

"Unlike ODF, MSOXML makes almost no use of existing W3C standards. Instead of using the W3C XForms specification for embedded forms, it invents its own XML terminology for forms. Instead of using the SVG specification for vector graphics, it uses its own vector graphics encoding. Instead of using the MathML specification for mathematical equations, it uses its own math encoding. Instead of using the W3C date format it invents its own (and perpetuates a leap year bug from the first releases of Microsoft Excel, rather than having the software that converts from .xls into MSOXML calculate the correct value)."

"This lack of re-use of existing (and accessibility-vetted) W3C XML standards is perhaps the main reason for the MSOXML specification running to 6,000+ pages, and is repeatedly cited by ISO voting members in their objections to the Fast Track ballot of MSOXML."

---"Reviewing the "Accessibility of Ecma Office Open XML File Formats"" by Peter Korn

---Link: <http://tinyurl.com/2n74eo> or original link: http://blogs.sun.com/korn/entry/reviewing_the_a_href_http

"Almost every one of the financial functions in OOXML depends on a "day count basis" flag, ... These represent various conventions for how days and months are counted. The problem is that the OOXML standard does not define these conventions, nor does it point to an authority for their definition. There are subtle behaviors here, especially when dealing with leap years and Excel's deviant treatment of dates in the year 1900. So lack of detailed definitions in this area make it impossible for anyone to rely on identical financial calculations from different OOXML implementations. This, in a field where being off by a penny can cause problems. Almost 30 spreadsheet functions are broken in this way.

(What do you call a scientist whose calculations are off by 50%? A cosmologist. What do you call an accountant whose calculations are off by 1%? A crook.) "

"So what is ODF doing about formulas? We're continuing to work on them. Rather than rush, we're doing careful, methodical work. We're documenting the functions in great detail. Where we have the choice between the common naive formula for a function and one that is numerically stable, we're documenting the stable function."

"... in the rush to write a 6,000 page standard in less than a year, Ecma dropped the ball. OOXML's spreadsheet formula is worse than missing. It has incorrect formulas that, if implemented according to this standard, would raise important health, safety and environmental concerns, aside from the obvious financial risks of a spreadsheet that calculates incorrect results. This standard is seriously messed up. Shame on all those who praised and continue to praise the OOXML formula specification without actually reading it."

---"The Formula for Failure" by Rob Weir

---Link: <http://tinyurl.com/2f3hps> or original link: <http://www.robweir.com/blog/2007/07/formula-for-failure.html>

"Rob Weir writes about the inadequacies of the Microsoft Office Open XML (MSOOXML) Formula definitions in his recent post: "The Formula for Failure". He highlights the loud bragging of Microsoft supporters and employees of how the MSOOXML is superior to the Open Document Format (ODF) as MSOOXML includes a 324 page "Formula Definition"."

"Although I have already covered this issue on the "grammar for formulas", as the old newsforge article on ODF interop with OOo and KOffice, the anti-ODF vendors seem to want to leverage on the fact that MSOOXML does have a "Formula Definition" and is willing to use this as a major advantage."

"While it is true that ODF v1.0 does not include a "Formula Definition", it is also true that throughout the entire history of spreadsheet usage, there has been no "Formula Definition." Although this has hindered interoperability to a certain extent, people got by using whatever information they had available to them."

---"Mathematically Incorrect" by Yoon Kit - Open Malaysia

---Link: <http://tinyurl.com/yno8fj> or original link: <http://www.openmalaysiablog.com/2007/07/mathematically-.html>

"Pressure from customers, including many governments, has pushed technology companies toward openness and toward ODF. Microsoft has responded with its new format, OOXML. However, a close examination of the origins, technical specifications and follow-on implementations of both formats reveals significant differences. Where ODF meets the four objective criteria of open standards handsomely, OOXML does not satisfy any of the four as extensively.

ODF showcases how an inclusive, consensus-driven, transparent development process can produce a standard that is available to everyone. OOXML's weaknesses begin at the fundamental level: its goals conflict. While the format proposes itself as a solution to backward compatibility, its approach, design and execution block full implementation by entities other than Microsoft. The great promise of XML, interoperability, cannot be achieved with OOXML. Ultimately, the format's conflicting objectives make it a poor candidate for a global standard.

In light of such fundamental limitations, basic questions need to be resolved before OOXML is considered for use on any basis and certainly as a potential standard. The questions resonate: How can OOXML with its lack of an open life-cycle, lack of complete documentation in the specification, lack of multiple software implementations, and lack of interoperability across diverse platforms meet the legal as well as practical needs in the organization for long-term document archiving and for accommodating the flow of information correctly through business processes across different types of systems?"

---"Achieving Openness: a closer look at ODF & OOXML" by Sam Hiser
---Link: <http://tinyurl.com/2u8yd4> or original link: http://www.odfalliance.org/resources/Achieving_Openness.pdf

"In Ecma's response document the truth of the matter comes out very vividly:

OpenXML is designed to represent the existing corpus of documents faithfully, even if that means preserving idiosyncrasies that one might not choose given the luxury of starting from a clean slate. In the ODF design, compatibility with and preservation of existing Office documents were not

goals. Each set of goals is valuable; sacrificing either at the expense of the other may not be in the best interest of users. (p.6 Ecma Response)

This is the fact of the matter. This clearly shows that one of them is trying to preserve the existing data created by a single vendor, while the other is to provide a generic encoding standard for office documents. It is true therefore that their purposes are different. Since there is a difference in purpose despite the overlapping with ODF, Ecma argues, OOXML can also exist with ODF.

But the issue is: providing a way of preserving a vendor's old documents is the service that a vendor is expected to do. This must happen. This can happen by converting the documents into ODF. Ecma did not prove that this is impossible.

We therefore think, that Ecma has the burden to prove that proprietary documents made by them cannot be converted into ODF. It is very likely that there can be a few elements that cannot be translated, since ODF was not made to serve a particular vendor's requirements. Once such elements are identified, Ecma can propose a model of extending ODF so that the possible problems are sorted out. This is the desirable way."

---WordProcessing ML Sub-Committee - Center for Excellence in E-governance, Indian Institute of Technology, Delhi

---Link: <http://tinyurl.com/34793w> or original link: <http://wordprocessingml.pbwiki.com/>

The bulk of this Information, as well as additional related information and articles, may be found through the following links:

"About Massachusetts..." July 12 2007 by Pamela Jones
<http://www.groklaw.net/article.php?story=20070712160114539>

"How open is "open" when Microsoft say it?" July, 9 2007 by David M Williams
http://www.itwire.com.au/index.php?option=com_content&task=view&id=13391&Itemid=1054

"My Comments to the Mass. ITD on OOXML - Please Send Yours" July 9, 2007 by Andy Updegrave

<http://www.consortiuminfo.org/standardsblog/article.php?story=20070709085538784>

"Talking with Microsoft's Gray Knowlton about MSOXML accessibility" July 9, 2007 by Peter Korn

http://blogs.sun.com/korn/entry/talking_with_microsoft_s_gray

"Massachusetts Lowers its Standards" July 03 2007 by Pamela Jones

<http://www.groklaw.net/article.php?story=20070703002707260>

"Six questions to national standardisation bodies" June 25, 2007 by FSFE

<http://fsfeurope.org/documents/msooxml-questions>

"Preserving legacy files with ECMA Office Open XML (MSOOXML) April 2007 by Chris Puttick

<http://www.odf-eag.eu/repository/white-papers/preserving-legacy-files-with-msooxml.pdf>

"Objections to JTC-1 Fast-Track Processing of the Ecma 376 Specification v. 0.1" - EOOXML objections January 23, 2007

http://www.grokdock.net/index.php/EOOXML_objections

"How Vista Lets Microsoft Lock Users In" December 5, 2006 by Cory Doctorow

<http://www.informationweek.com/story/showArticle.jhtml?articleID=196601781>

From: [Scott Tater](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Opposition to the adoption of ECMA 376, the "Microsoft OfficeOpen XML" as a public document standard
Date: Friday, July 13, 2007 2:24:49 PM
Attachments:

To Whom it May Concern:

I am writing to register my opposition to the adoption of ECMA 376, the "Microsoft OfficeOpen XML" as a public document standard in Massachusetts. This decision will effect me personally because I live and work in Massachusetts.

A public standard should be in the best interests of the public, not those of a single vendor. A standard fit for public adoption should be 1) completely open, 2) free to implement without fear of patent suits, 3) built based on public need and not contain tricks or hooks favorable to one company.

From my research into this topic, I do not believe ECMA 376 is a good standard or one that would benefit Massachusetts. It will instead allow Microsoft to further its product monopoly by locking out competing products, forcing users of public documents to purchase Microsoft products, and preventing any migration away from Microsoft standards.

I have copied below a summary document I used to understand the issue that you can read for more information.

Thanks and Regards,
Scott Tater
Brookline, MA

<http://fsfeurope.org/documents/msooxml-questions>

The following six questions relate to the application of the ECMA/MS-OOXML format to be accepted as an IEC/ISO standard. Unless a national standardization

body has conclusive answers to all of them, it should vote no in IEC/ISO and request that Microsoft incorporate its work on MS-OOXML into ISO/IEC 26300:2006 (Open Document Format).

This is a summary document. More detailed information is available online.

* http://www.grokdock.net/index.php/EOOXML_objections

* http://www.xmlopen.org/ooxml-wiki/index.php/DIS_29500_Comments

* <http://www.nooolxml.org/arguments>

1. Application independence?

No standard should ever depend on a certain operating system, environment or application. Application and implementation independence is one of the most important properties of all standards.

Is the MS-OOXML specification free from any references to particular products of any vendor and their specific behavior?

2. Supporting pre-existing Open Standards?

Whenever applicable and possible, standards should build upon previous standardization efforts and not depend on proprietary, vendor-specific technologies.

MS-OOXML neglects various standards, such as MathML and SVG, which are recommendations by the W3C, and uses its own vendor-specific formats instead. This puts a substantial burden on all vendors to follow Microsoft in its proprietary infrastructure built over the past 20 years in order to fully implement MS-OOXML. It seems questionable how any third party could ever implement them equally well.

What is the benefit of accepting usage of such vendor-specific formats at the expense of standardization in these areas? Where will other vendors get

competitive, compatible and complete implementations for all platforms to avoid prohibitively large investments?

3. Backward compatibility for all vendors?

One of the alleged main advantages of MS-OOXML is its ability to allow for backward compatibility, as also referenced in the ECMA International press release.

For any standard it is essential that it is implementable by any third party without necessity of cooperation by another company, additional restricted information or legal agreements or indemnifications. It is also essential to not require the cooperation of any competitor to achieve full and comparable interoperability.

On the grounds of the existing MS-OOXML specification, can any third party regardless of business model, without access to additional information and without the cooperation of Microsoft implement full backward compatibility and conversion of such legacy documents into MS-OOXML comparable to what Microsoft can offer?

4. Proprietary extensions?

Proprietary, application-specific extensions are a known technique employed in particular by Microsoft to abuse and leverage its desktop monopoly into neighboring markets. It is a technique at the heart of the abusive behaviour that was at the core of the decision against Microsoft by the European Commission in 2004 and Microsoft is until today continuing its refusal to release the necessary interoperability information.

For this reason, it is common understanding that Open Standards should not allow such proprietary extensions, and that such market-distorting techniques should not be possible on the grounds of an Open Standard.

Does MS-OOXML allow proprietary extensions? Is Microsoft's implementation of MS-OOXML faithful, i.e. without undocumented extensions? Are there safeguards against such abusive behaviour?

5. Dual standards?

The goal of all standardisation is always to come to one single standard, as multiple standards always provide an impediment to competition. Seeming competition on the standard is truly a strategic measure to gain control over certain segments of a market, as various examples in the past have demonstrated.

There is an existing Open Standard for office documents, namely the Open Document Format (ODF) (ISO/IEC 26300:2006). Both MS-OOXML and ODF are built upon XML technology, so employ the same base technology and thus ultimately have the same theoretical capabilities. Microsoft itself is a member of OASIS, the organization in which the ODF standard was developed and is being maintained. It was aware of the process and invited to participate.

Why did and does Microsoft refuse to participate in the existing standardization effort? Why does it not submit its technological proposals to OASIS for inclusion into ODF?

6. Legally safe?

Granting all competitors freedom from legal prosecution for implementation of a standard is essential. Such a grant needs to be clear, reliable and wide enough to cover all activities necessary to achieve full interoperability and allow a level playing field for true competition on the merits.

MS-OOXML is accompanied by an unusually complex and narrow "covenant not to sue" instead of the typical patent grant. Because of its complexity, it does not seem clear how much protection from prosecution for compatibility it will truly provide.

Cursory legal study implies that the covenant does not cover all optional features and proprietary formats mandatory for complete implementation of MS-OOXML. So freedom of implementation by all competitors is not guaranteed for the entire width of the proposed MS-OOXML format, and questionable even for the core components.

Does your national standardization body have its own, independent legal analysis about the exact nature of the grant to certify whether it truly covers the full spectrum of all possible MS-OOXML implementations?

All these questions should have answers that should be provided by the national standardization bodies through independent counsel and experts, and in particular not by Microsoft or its business partners, which have a direct conflict of interest on this issue.

If there is no good answer to any one of them, a national body should vote no in ISO/IEC.

From: [Michael Audette](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Standards, Mass. Resident
Date: Friday, July 13, 2007 2:15:02 PM
Attachments:

Friends,

I write in opposition to the inclusion of MS xml in the list of acceptable open standards.

The implementation of xml in Microsoft's products is, as is the case with most of their "standard" implementations, a sub or supra-set of the agreed standards. It is quirky and designed to keep workproduct restricted to MS's own software. This flies against the whole purpose in moving to open formats.

Don't do this.

MJ Audette

From: [Theodore Wong](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Objection to the proposal to include OpenXML as an information format in ETRM 4.0
Date: Friday, July 13, 2007 2:10:11 PM
Attachments:

Dear Sir/Madam:

I am writing to object to the proposed inclusion of Microsoft's OpenXML format as an accepted information format in ETRM 4.0. My primary concern is that Microsoft, despite providing reassurances that they will keep OpenXML free and open, has a demonstrated history of abusing open standards by incorporating proprietary extensions to said standards that only operate on their products. The best example of such abuse is the multiple extensions added by Microsoft in the late 1990s to the then-emerging HTML standards, which resulted in a plethora of websites "best viewed in Microsoft Internet Explorer" (and illegible in any competing web browser). The browser and website design industry is only just recovering from this abuse, in turning back to website designs that are best viewed in any browser that conforms to truly open and non-proprietary standards. I urge you not to allow Microsoft to continue to lead the office-productivity suite industry down the same proprietary path.

Sincerely,

Theodore Wong

--

Theodore Wong <tmwong at pair.com>
<http://www.tmwong.org>

From: [Bob Adams](#)
To: [Standards \(ITD\);](#)
CC: [pj at groklaw.com;](mailto:pj@groklaw.com)
Subject: Office Open XML
Date: Friday, July 13, 2007 1:53:16 PM
Attachments:

When considering your decision please bear in mind the following quote about Office Open XML spreadsheet capabilities:-

"Under Sarbanes-Oxley, a CEO or CFO puts himself at personal risk if he signs off on financial numbers derived from processes and tools that he knows to give erroneous results. So we utterly reject a rushed process that has lead to an Ecma Standard which incompletely and incorrectly defines spreadsheet functions. Some things are worth taking the time to do right."

Regards, Bob Adams

--

From: [George Mitchell](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open XML is not an open standard
Date: Friday, July 13, 2007 1:52:09 PM
Attachments:

ETRM v4.0 contemplates adding Ecma-376 Office Open XML Formats as an approved format for Massachusetts. Despite the name, however, this is an open standard only in the sense that the Ministry of Truth in George Orwell's 1984 was in charge of uttering true statements. As a computer professional for the last forty years, I recommend strongly AGAINST making this change to ETRM.

George Mitchell
25 DeForest Street
Hyde Park, MA 02136-1307
(617) 395-6608

From: [Ned Boddie](#)
To: [standards at state.ma.us;](#)
CC:
Subject: About OfficeOpen XML specification (now Ecma 376)
Date: Friday, July 13, 2007 1:42:44 PM
Attachments:

Sirs,

I am writing with concern that you might allow the adoption of the ECMA 376 as a “open” standard.

There are numerous locations in the spec that require intimate knowledge of internal Microsoft code, or reverse engineering of the Microsoft code in order to fully interoperate seamlessly.

For instance note the ‘footnotLayoutLikeWW8’ section of the standard, section 2.15.3.26. In that section’s example there appears the sentence:

...Then applications should mimic the behavior of Microsoft Word 6.x/95/97 when determining the placement of
12 those footnotes on the displayed page, as needed. *end example*]

Do you really think that another vendor other than Microsoft will be able to accurately reproduce code to do this? Would a vendor who does reproduce the code be liable under the DMCA for ‘reverse engineering’ the code? Is the reference process part of a patent that Microsoft holds, thus requiring another vendor to license the technique to move forward?

There are numerous examples of this kind of reliance on already undocumented behavior in the ECMA 376 standard. Do you want to be the State that further enables the obfuscation of your documents in the future by enabling the use of such a slanted specification?

Regards,

[Ned Boddie](#)

From: [Stephen Hersey](#)
To: [Standards \(ITD\);](#)
CC:
Subject: My Opposition To Adoption of ECMA 376
Date: Friday, July 13, 2007 1:22:05 PM
Attachments:

Dear ITD,

I am writing to you, as an IT professional who lives and works in Massachusetts, to oppose the inclusion of ECMA 376, the "Microsoft Office Open XML" specification, in your list of usable standards for public documents.

In order for a file format to be suitable for use with public documents, it must be open, interoperable, and freely implementable by anyone. Alas, Microsoft's OOXML fails on all three counts.

1. OOXML Is Not Open

Despite having an ECMA standard designation (a designation obtained through a VERY questionable process, BTW), OOXML is NOT open. This 6000-page standard embodies numerous REQUIRED features that refer opaquely to other, CLOSED Microsoft formats, such as "do this the way Office 97 did it;" without open access to these other formats, the "standard" cannot be implemented. In addition, although it uses XML as a container, OOXML includes proprietary binary "tags," data containers that can be essential to rendering a document, but that -- again -- are NOT defined in open standards. Simply put, this "standard" is incomplete and insufficient to implement a "compliant" implementation.

Most critically, as a practical matter, the OOXML "standard" essentially blesses WHATEVER implementation Microsoft chooses to implement in its Office product, regardless of whether it actually matches the published standard or not. ECMA notwithstanding, Microsoft OWNS the OOXML format and will do whatever it pleases with it, and those who wish to work with OOXML documents will be forced to march to MS' tune, as the company's history proves beyond doubt.

2. OOXML Is Not Interoperable

The above-mentioned undocumented elements adopted from proprietary MS formats, plus the use of mysterious binary containers, make it impossible to fully implement the OOXML format without serious reverse-engineering of other -- closed -- Microsoft

formats. Interoperability? "He's Dead, Jim." Add in the fact that some of the mysterious binary objects will be Windows-specific, and interoperability across operating systems is REALLY dead.

3. OOXML Cannot Be Freely Implemented

Microsoft provides a limited pledge not to assert patents embodied in OOXML against persons implementing readers for OOXML documents. However, this pledge is hedged about with more mines than the US base at Guantanamo Bay. No license is given to implement the parts of OOXML that depend on those OTHER, closed Microsoft standards, nor is the pledge actually valid for Microsoft's de facto OOXML implementation; in the very likely event that the de facto Office implementation deviates from the published standard, third parties cannot implement it. One is left with a devil's choice: Incompatibility with what most users will perceive as the "gold standard" implementation, or stepping outside the narrow Microsoft nonaggression pledge. Thus, for several independent reasons, OOXML cannot be freely implemented by third parties.

In this regard, it is also instructive to observe Microsoft's pathetically-bad implementation of an ODF document converter for Microsoft Office. This converter is so miserably bad (especially in comparison with OpenOffice's Word converters) that one is forced to conclude that either 1) Microsoft does not WANT to interoperate with open formats, or 2) Microsoft is incapable of producing competent software implementations. In neither case is it advisable to become dependent on MS' implementations if one wants interoperability.

4. OOXML Disadvantages Visually-Impaired Users

Much has been made of the purported difficulty of using OpenOffice and other Open Source office suites for visually-impaired users. Many of these criticisms appear to be based on the idea that MS Office has better support for screen-readers than the Open Source products. While this is a questionable proposition at present (as assistive tools take advantage of the internal API access provided by Open Source applications), it should be pointed out that the only significant implementation of OOXML that exists (Office 2007), like every new version before it, is incompatible with existing assistive software. This situation is unlikely to change with respect to Microsoft Office; MS will keep releasing new versions that remain the only option for OOXML documents and that break existing assistive tools, and the toolmakers will be obliged to reverse-engineer things from the very beginning to restore functionality.

Contrast this with the case of Open Source office suites; once a visual assist tool is interfaced to an Open Source office suite, any update to that suite that breaks the assistive tool is immediately accessible to the toolmaker, who then has a MUCH better range of

tools and options for restoring compatibility. In the long term, Open Source office applications are a MUCH better option for visually-impaired users who must rely on third-party vendors for assistive software.

For the reasons stated above, I believe that OOXML is not suitable for consideration as a suitable document format for public documents.

Sincerely,

Stephen Hersey

Each of us has strengths and talents that others don't. Whether innate or learned, these are gifts -- and a gift not shared is a sad and lonely thing. Using our gifts for the benefit of all is an ethical obligation for every intelligent being. (The magic only works if you pass it on!)

From: [Eric Buddington](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Public Comment on ETRM Draft 4.0
Date: Friday, July 13, 2007 1:07:41 PM
Attachments:

My name is Eric Buddington, and I am a resident of North Adams.

I produce a television show called "Worth Knowing", through Northern Berkshire Community Television. We do our best to report how our local, state, and federal governments work. This involves many requests of information from City Hall.

Since I do not own Microsoft products, I cannot reliably read documents in Microsoft-proprietary formats. ECMA 376 seems to be such a format, wrapped in a veneer of standards approval.

It is not clear that free software programmers will be allowed to create and distribute software to read and write ECMA 376, since the standard makes opaque references to secret Microsoft formats. It is also not clear that it will be possible to do so without the threat of copyright-based lawsuits from Microsoft. Finally, it is simply an overly-complex format that would be horrible to implement even if it is legal to do so.

I am aware of no means for me to read and translate ECMA 376 documents. In contrast, ODF is easily handled by OpenOffice, KOffice, and StarOffice. PDF is readable by xpdf and somewhat convertible by pdftotext, pdftoppm, pdftops, and of course the Gnu Image Manipulation Program (GIMP).

Given these constraints, ECMA 376 is, for all practical purposes, a closed format. As a citizen, I insist that the responsibility of the Commonwealth is to ensure that I **can** read state-produced documents, not that I hypothetically **could**.

Please do not include Microsoft's ECMA 376 in your list of approved formats for state documents.

Thank you.

Eric Buddington
23 Warren St
North Adams, MA

From: [Ehud.Gavron at Login.COM](mailto:Ehud.Gavron@Login.COM)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Standards for Documents
Date: Friday, July 13, 2007 12:59:38 PM
Attachments:

Gentlemen, and Ladies:

I'm the CEO of a networking company in Arizona. We don't do a lot of business with the State of Massachusetts but that could always change. I'm sure you people do lots of vacation business with states such as ours :)

I write you today to urge you to follow in the footsteps of those who said open standards are the way to move forward.

I urge you to reject non-open standards (those not fully published so they cannot be duplicated nor used by other software manufacturers) such as Microsoft's OOXML, also known as ECMA 376.

I know your time is short, and I thank you for reading this letter.

Should you wish to discuss in depth why

- open standards are good for the State of Massachusetts
- open standards lower the cost of operations
- open standards provide for FUTURE interoperability, data storage, and data usability,

you are more than invited to write me at [Ehud.Gavron at Login.com](mailto:Ehud.Gavron@Login.com), call me at 1-877-543-1082 x 101, or come visit the beautiful Grand Canyon State, and when you're staying at one of our famous resorts like Miraval or Canyon Ranch, just give me a jingle and I'll join you for a drink by the pool to talk open standards.

Cheers

Ehud Gavron
Tucson AZ

.

From: [Steven L. Kleiman](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Ecma-376
Date: Friday, July 13, 2007 12:58:34 PM
Attachments:

Gentlemen:

I write to urge the Commonwealth to oppose the addition of Ecma-376 - Office Open XML Formats (OOXML) because it would be a harmful step backwards for the Commonwealth for the following reasons:

- * *The Commonwealth should encourage interoperability* - Adoption of Ecma-376 / OOXML would be a shift away from interoperability offered by ODF because OOXML is a single vendor format that is not interoperable with other formats and applications.
- * *The Commonwealth should encourage choice* - Adoption of Ecma-376 / OOXML would eliminate choice because as a single vendor format, it does NOT provide choice of applications support, like ODF.
- * *The Commonwealth should encourage harmonization* - Adoption of Ecma-376 / OOXML would discourage harmonization by creating a disincentive for Microsoft to harmonize with existing open standards such as ODF and with other -- non-Microsoft -- applications.

Sincerely yours,
Steven L Kleiman
Professor of Mathematics
MIT

From: [Ben Klemens](#)
To: [Standards \(ITD\)](#);
CC:
Subject: On the OASIS v ECMA debate
Date: Friday, July 13, 2007 12:56:02 PM
Attachments:

Dear IT Division,

My name is Ben Klemens. I am a Guest Scholar at the Brookings Institution, a Washington think tank, where I work on issues of technology and intellectual property. However, my comments are my own, and should not be attributed to Brookings as a whole.

As I understand it, there is currently a debate over Massachusetts's choice of archive format for the wealth of electronic data the state produces every day. I respectfully offer my own comments on the question.

I. "Choice of standards" is an oxymoron.

My own training includes both Economics and Political Science. The two fields have one interesting difference in perspective regarding the value of choice. The stereotypical Economist insists that more choice is always good. [I say `stereotypical' because there are Economists all along the spectrum; please forgive my hyperbole.] Milton Friedman summarized it perfectly in his book, "Free to Choose," where he pointed to dozens of examples where people were given multiple options and selected the best for themselves. Some argue that this applies to standard-setting: present a few standards and leave people free to choose.

Conversely, the stereotypical Political Scientist is not so convinced that choice is always a good thing. For example, every issue the journal "Constitutional Political Economy" has a cover illustration of Ulysses tied to the mast. The thought behind the cover design is that society as a whole could not exist if we did not allow ourselves to be bound by laws. Laws reduce our choices, yet they make our lives better by allowing us to live in a safe, functioning society.

Good standards are not a marketplace. They are a tying to the mast. A choice of standards does not improve welfare the way that a choice of products in the marketplace does. It is wonderful that the supermarket has a dozen choices on even mundane items

like salt and pasta, but at the hardware store, it is nothing but frustration that there are metric and imperial measurements for screw threads.

Every business ties its users to the mast by decisions regarding the measurements for its hardware and the standards for its software, because leaving every employee free to choose whatever works best for him or her is to defeat the purpose of standards. The State of Massachusetts is correct to select a standard for its software. The question now is which single standard it will adopt.

II Simplicity and widespread adoption

It is strongly in the interest of the State of Massachusetts that it adopt a standard that will be understood and adopted by as many programmers and users as possible. A specification that is a standard by legal definition but which no programmer fully understands is a failed standard.

The ECMA specification has explicitly chosen to include details of backward-compatibility with Microsoft products as part of the specification. This is a mistake. Additional detail on one hand and flexibility and usability on the other are directly at odds.

The general consensus among those in the technical community is that no one but Microsoft will be able to fully implement the 6,000 page standard as written, because one human can not fully master a 6,000 page standard filled with exceptions. When I write code in C, I am confident that it is fully compliant with all 600 wide-margined pages of the ISO's C standard. The authors of the XML standard had the goal of writing a set of rules simple enough that a single graduate student could write an fully-compliant XML parser in about two weeks. But with the addition of thousands of pages of detail on top of the basic framework, there is no way for a single person to guarantee that her new tool is fully compliant with all details of the standard, which means that that person will be reluctant to use that specification, and that she will not be able to guarantee that her work is bug-free.

One popular pundit (Paul Graham) puts the question of easy comprehensibility another way. He points out that every widely-adopted standard is supported by a short book that every user of the standard has on his or her bookshelf. C has what is affectionately called K&R, Perl has what is affectionately called the Camel Book, Ruby has Why's Poignant Guide, et cetera. It is not legal dictum, but the widespread, easy evangelism of the press that gives the standard depth among the programming community, and it is that depth that makes the standard reliable and powerful.

The future survival of The State of Massachusetts's documents depends on having thousands---hopefully millions---of individuals who each fully understand and can

confidently use the standard. It is therefore advised to avoid adopting a standard that could not be fully explained in a short book with an affectionate nickname.

III Simplicity versus backward compatibility

Few standards, if any, succeed by being all-inclusive. Rather, a good standard strives to give full detail for a small core of concepts, and then instructions on how to build from that core as the need arises. For example, the Library of Congress did not write down a full classification system in 1897. The system written down at that time consisted of broad classes and a set of rules for adding to the scaffolding as new subjects appeared. The classification for my book on software policy (K1519) could not possibly have existed in 1897, but the framework was flexible enough to add it when software law became a meaningful subject.

Similarly, a good programming standard provides the basic scaffolding to support any future work, and enough tools (such as a macro writing language) to build more tools as the need arises---and no more. As above, the more moving parts a system has, the less comprehensible it is, and the more likely it is to break.

Is the additional detail needed for backward compatibility even necessary for a good standard? Both the OASIS and ECMA document specifications use XML, which is not compatible with its predecessor, SGML. Nor is it compatible with HTML, the language of literally millions of Web pages. The Library of Congress classification is not compatible with the Dewey Decimal system (est. 1876). C++ is not compatible with C. Among document formats, Office Open XML (aka Word 2007 format), Word 2003 format, Word 95 format, Word 2.0 format, and Word for DOS format are all mutually incompatible. In short, history---as written by computing at large and Microsoft, Inc. in particular---has shown that a standard is judged on its own merits, not on being a superset of an existing standard.

The ECMA standard chooses backward compatibility at the cost of simplicity and extensibility, but backward compatibility is rarely a major issue for a standard, and simplicity decidedly is.

IV Summary.

Standard-setting is not about establishing a marketplace of ideas. It is about committing to a single societal norm that everyone in the organization will follow, for the benefit of all. The State of Massachusetts should choose one standard for its document formats. Fortunately, it has before it only one standard, from OASIS. The alternative is a product specification with ECMA approval. The ECMA specification fails as a standard because it is not comprehensible by a single individual and is built to favor encoding a specific

vendor's current format over building a framework for future enhancement. Therefore, my recommendation for the State of Massachusetts is that it should adopt the OASIS standard as the sole format for its documents.

Please contact me at this address or at the number below if you have further questions or comments.

Regards,

Ben Klemens Guest Scholar Brookings Institution

213 926-6336

<http://www.brookings.edu/scholars/bklemens.htm>

<http://ben.klemens.org>

From: [Joshua J. Kugler](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Re: Massachusetts document standards
Date: Friday, July 13, 2007 12:43:06 PM
Attachments:

On behalf of the future generations who may need to access and process the documents created by this generation, I ask the Massachusetts to choose ODF as the only viable option for truly open document access and archiving.

j

--

Joshua Kugler

Lead System Admin -- Senior Programmer

<http://www.eeinternet.com>

PGP Key: <http://pgp.mit.edu/> ID 0xDB26D7CE

PO Box 80086 -- Fairbanks, AK 99708 -- Ph: 907-456-5581 Fax: 907-456-3111

From: [Kyle Waters](#)
To: [Standards \(ITD\);](#)
CC:
Subject: adoption of openxml
Date: Friday, July 13, 2007 12:35:07 PM
Attachments:

Dear Ms. Pepoli:

I am not a Massachusetts resident, but I have been watching the Massachusetts ODF decision with great interest. I have met with legislative and executive leaders in attempt to establish a similar ODF policy in Utah. I am concerned by the news of the consideration of the adoption of Office Open XML.

While I believe there are times for government involvement in the market system, I don't believe that government involvement should favor one company or even a few. When a government body must involve itself in a market system it should seek to increase market competition. Massachusetts has exemplified this with it's adoption of the ODF standard.

The Open Document Standard is maintained by a consortium of which any company or organization may join. Any individual or organization has full licensing rights to the standard and it is well documented. As part of an organization that creates documents for government officials and bodies, I recently evaluated document formats that fit our needs. The open and documented nature of ODF made it my organizations format of choice.

Open Office XML does not provide full licensing rights. Certain companies have recently entered licensing agreements in order to get full licensing rights(Novell, Linspire), so while this create some competition among companies supporting XML it is restricting the market compared to ODF. Also as a programmer the documentation and cooperation for Office Open XML prevents most organizations from being able to utilize it fully.

The Open Document Format is a true open format while the Office Open XML format is not. Please keep your commitment to open formats and do not adopt Office Open XML. While I am not a resident of Massachusetts I am asking that you consider my concern for the benefit of your state as well as others. I hope to be able to continue to use your state as a model of appropriate technology leadership.

Sincerely,
Kyle Waters

--

no amount of fear can stop the rise of free media, or free software (they are the same, after all)

Jonathan Swartz
CEO Sun Microsystems

From: [John Morgan](#)
To: [Standards \(ITD\)](#);
CC:
Subject: OfficeOpen XML should not be accepted
Date: Friday, July 13, 2007 12:34:51 PM
Attachments:

As a professional software engineer with 35 years experience I urge Massachusetts to not include OfficeOpen XML in the list of acceptable document formats. There are three reasons why I urge this. First, supporting more standards works to restrict competition rather than enhancing it. Second, the process used to develop the OOXML specification is flawed and the result is a format that is difficult or impossible for vendors other than Microsoft to implement correctly. Third, the requirements of Massachusetts should not be driven by the business goals of any particular vendor.

There are plenty of examples of how multiple standards works against competition rather than for it. One recent example from my life is cellular telephony. My wife recently got an iPhone which works on the AT&T network. My Sanyo phone works on the Sprint network. Although both of these phones comply with a cellular phone standard they are different standards. She will never be able to transfer her phone to the Sprint CDMA network and I will never be able to transfer my phone to the AT&T GSM network, so we pay two cell phone bills each month when we'd rather pay just one. Another example is electrical power. Most of the American continents uses 110volt 60Hz AC for power and most of Europe, Asia and Africa uses 220volt 50Hz AC, but even within these areas there are a variety of plug and socket styles. As a consequence most world travelers need to travel with a variety of converters and adapters, and can still end up with non-functional or damaged devices.

Having a multitude of "standard" document formats is even less sensible. Because each person might have to open and possibly edit documents in any of the accepted formats they will need a variety of applications and conversion programs. This will increase costs and reduce productivity for no benefit to the people of the Commonwealth.

Although I applaud Microsoft for documenting the OfficeOpen XML format, that does not make it an acceptable format for use by public institutions. The goal of the OOXML specification was to document the behavior of a particular implementation (Microsoft Office) rather than to develop a new format for representing document content and form. As a consequence it is an order of magnitude larger than the ODF specification and still

does not fully document specific behaviors. Although many companies have pledged to "support" OOXML, the support is severely limited - often merely to read certain fields and ignore everything else. Worst of all, there is no process for updating the format if a problem or limitation is found.

In contrast, ODF was designed specifically to represent documents in the most straightforward and flexible manner possible. During its development the reference implementation was changed numerous times to accommodate changes in the draft standard. The OpenDocument committee continues to accept input and modify the format to address legitimate concerns, such as those of the visually impaired. They have pledged to do the same for Microsoft if it will work with them.

Finally, I would like to point out that Microsoft has more than enough expertise and money to support OpenDocument natively - they already support more limited formats such as RTF. That they have chosen not to do so should not count against OpenDocument or in favor of OOXML. The purpose behind adopting standard document formats is so that Massachusetts - not Microsoft - has control of and access to documents now and in the future. I respectfully suggest that OpenDocument furthers this goal, while OfficeOpen XML does not.

- John Morgan

From: [J Leger](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Standards
Date: Friday, July 13, 2007 12:25:56 PM
Attachments:

To:
standards at state.ma.us

"ECMA is an international, private (membership-based) standards organization for information and communication systems. ISO is an international standard-setting body composed of representatives from various national standards bodies. The organization produces world-wide industrial and commercial standards."

Pay attention to this: "private (membership-based) standards organization". Microsoft got ECMA approved because it is a private company approved by private companies. The fact is that Microsoft was NOT approved by ISO; so Microsoft went to ECMA and got approved so that they can show to the World that their format is recognized by a "standards organization"; then, "Micro\$oft...", sorry for the miss spelling, ...Microsoft try to coerce anyone, any company, any organization, or any government to accept their so called "standards" when there is already an existing standard; and two standards, if they exist, will bring more cost to anyone involved. What ever they call it, Microsoft OOMXL is NOT a Standard and it is NOT Open. ODF (Open Document Format) IS.

Do some research:

There are some who are more knowledgeable than I am, and they described it beautifully for everyone to understand, even for people in governments who don't know anything about it or who have not done any research...

Questions for Microsoft on open formats

<http://news.bbc.co.uk/2/hi/technology/6291124.stm>

We have laid down six questions we want Microsoft to answer - but the key one is this: Why did and does Microsoft refuse to participate in the existing standardisation effort?

Get the Yahoo! toolbar and [be alerted to new email](#) wherever you're surfing.

From: [Kristian Hermansen](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ODF in massachusetts
Date: Friday, July 13, 2007 12:25:43 PM
Attachments:

I currently work for Cisco Systems as an engineer. I think this is a harmful step for Massachusetts. As you may or may not know, the University of Massachusetts Amherst recently became the first school in the United States to officially support Linux and OpenOffice campus-wide. I think that is a major accomplishment. I was once a student there!

I can elaborate further, but please let me know if I am sending my comments to the right place...

----- Original Message -----

Subject: ODF Action Alert - Massachusetts - PLEASE COMMENT BY JULY 20
Date: Fri, 13 Jul 2007 04:56:16 -0700
From: Marino Marcich <mmarcich at odfalliance.org>

Massachusetts has released the next draft of its Enterprise Technical Reference Model (ETRM) for public comment which would place Ecma-376 Office Open XML Formats (OOXML) on par with ODF. Two years ago, Massachusetts reversed a similar conclusion as a result of strong public input. *Your comments can make a difference!!! Write to standards at state.ma.us no later than 20 July 2007 encouraging Massachusetts to reject OOXML's inclusion under the ETRM.* Individual responses are much better than form letters, but you may want to use Andy Updegrave's excellent submission/blog and the points below to help guide your efforts. The Alliance will post its submission on the web site (<http://www.odfalliance.org>) shortly. Thanks.

Enterprise Technical Reference Model v.4.0 Public Review Draft -
<http://www.mass.gov/?pageID=itdsubtopic&L=3&L0=Home&L1=Policies%2c+Standards+%26+Guidance&L2=Drafts+for+Review&sid=Aitd>

[_The ConsortiumInfo.org Standards Blog_](http://www.consortiuminfo.org/standardsblog/) -

<http://www.consortiuminfo.org/standardsblog/article.php?story=20070709085538784>

Urge the Commonwealth to oppose the addition of Ecma-376 - Office Open XML Formats (OOXML) because it would be a harmful step backwards for the Commonwealth for the following reasons:

- * *The Commonwealth should encourage interoperability* - Adoption of Ecma-376 / OOXML would be a shift away from interoperability offered by ODF because OOXML is a single vendor format that is not interoperable with other formats and applications.
- * *The Commonwealth should encourage choice* - Adoption of Ecma-376 / OOXML would eliminate choice because as a single vendor format, it does NOT provide choice of applications support, like ODF.
- * *The Commonwealth should encourage harmonization* - Adoption of Ecma-376 / OOXML would discourage harmonization by creating a disincentive for Microsoft to harmonize with existing open standards such as ODF and with other -- non-Microsoft -- applications.

Marino Marcich
ODF Alliance
1090 Vermont Avenue, NW, 6th Floor
Washington, DC 20005
Direct Line: 202-789-4450
Main Switchboard: 202-289-7442
Fax: 202-289-7097
www.odfalliance.org

--

This message has been scanned for viruses and dangerous content by MailScanner, and is believed to be clean.

Discuss mailing list
Discuss at blu.org
<http://lists.blu.org/mailman/listinfo/discuss>

--

Kristian Hermansen

From: [Tony](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OOXML vs ODF
Date: Friday, July 13, 2007 12:23:58 PM
Attachments:

As an information technology programmer, I cannot object forcefully enough to allowing Microsoft's XML file format to be accepted as an open standard. Here are just a few reasons:

1) It is not Open because royalties must be paid to use the specification.

ODF is royalty free, now and forever.

2) It requires intimate knowledge of the internal workings of existing proprietary file formats. Some of the requirements that must be implemented are explained no better than "do it like Word 95". This wouldn't be so bad if Word 95 weren't itself a closed, secret format to which even Microsoft (the format's progenitor) can't correctly adhere among different iterations of its own software. It cannot be faithfully reproduced by anyone not inside Microsoft. It can't even be faithfully reproduced by Microsoft. Correct interoperability with other implementations is impossible.

ODF specifies all of its format attributes in terms of specific results, and documents every aspect for achieving those results. No hidden, insider knowledge is required to implement any of its sections.

See:

http://www.freesoftwaremagazine.com/articles/odf_ooxml_technical_white_paper?page=0%2C6

3) It is heavily patent encumbered. While Microsoft grants a patent license for the first version of the format, the license is ONLY for the first version of the format. Microsoft does not guarantee patent grants for future (inevitable) deviations from the first format.

ODF is completely free of patent threats, now and forever.

See: <http://www.nooxml.org/patents>

4) Its spreadsheet specifications produce the wrong results. This indicates that the entire specification was rushed out the door and is unreliable.

ODF has been painstakingly thought out over the years, and its numeric results are verifiably correct.

See: <http://www.robweir.com/blog/2007/07/formula-for-failure.html>

I could produce a massive tome of technical glitches and problems surrounding OOXML, but I want to limit myself to just a small sampling of the technological problems so as to not overwhelm you.

From: [Terry Bowling](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Do not accept Open XML Ecma 376 format
Date: Friday, July 13, 2007 12:14:42 PM
Attachments:

To whom it may concern,

I am writing to ask that the Microsoft Open XML format (Ecma 376) not be considered on the list of usable "open standards."

The purpose of the standards is the protection of information for the people. The standards are not intended to promote a single vendor or product, but rather to provide a truly open format that any vendor could provide a solution for. Truly open standards would help to ensure that anyone today or in the future can find or develop a product to access the people's information. This concept should overrule anything else.

The Open XML, while supposedly "Open", provides no protection against patent aggression from Microsoft. Meaning that there are no guarantees that in the future and alternative application or platform would not face legal problems from Microsoft.

Microsoft is a convicted monopolist with a history of aggressive legal lawsuits against competitors. It is interesting to note that Open XML was not even being promoted by Microsoft until Massachusetts began to consider standardizing on the Open Document Format.

It is also interesting to note that Microsoft could easily support the Open Document Format as a native feature. Without the need for a silly, unreliable plugin. They choose not to because it is not in their own best interest for their own gain of monopolizing the office documents formats. They have their own interests in mind, not the interests of the people.

I work as a Systems Administrator for Verizon Communications, as a part time college instructor for ITT Technical Institute, and IT Director for Emmaus Lutheran Church & School. I can attest to the power of the power of this

monopoly. I have experienced many examples of students, families, and faculty/employees who feel forced to either purchase the expensive Microsoft Office suite or become thieves by obtaining illegal copies so that they are able to interact and share information with their school or company. This also extends to the requirement of having the latest versions of Microsoft Office, because Microsoft refuses to support older versions.

Our government and education systems SHOULD NOT impose a vendor's product on the people. This Open XML format, while claiming to be "open," will force the people to use a single vendor's product.

Please choose a truly open format, such as the OASIS Open Document Format. Microsoft can easily support it also.

Sincerely,
Terry Bowling

From: [Dale Kerby](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Public Comment on ETRM Draft 4.0
Date: Friday, July 13, 2007 12:01:53 PM
Attachments:

13 JULY 2007

Information Technology Division
Commonwealth of Massachusetts
Attention: Beth Ann Pepoli

Re: Public Comment on ETRM Draft 4.0

Dear Ms. Pepoli:

I write to urge Massachusetts to adopt a truly open format to preserve universal access to public documents. I will leave it to others to discuss technical matters; and yet others to address legal concerns. I write to have you consider the impact of limiting a truly open format. Consider that there is already an approved format. Consider that Microsoft (a convicted monopolist) wants to displace, or at least have equal footing, with that format; and that they would control that closed and limiting format. Consider that access to documents created under the second format will eventually be inaccessible as that 'format' changes. (Consider that documents created under earlier Microsoft products are not accessible from later Microsoft products). Consider that two competing formats do not provide equal access to documents. It is a well known Microsoft tactic to embrace, extend and extinguish competition; a format is no different to them than a competitor. Consider that a 'Standard' is something that should be available to all in a governmental setting. Consider the following Wikipedia text: "Standardization... in the context related to technologies and industries, is the process of establishing a technical standard among competing entities in a market, where this will bring benefits without hurting competition. It can also be viewed as a mechanism for

optimising economic use of scarce resources such as forests, which are threatened by paper manufacture. As an example, all of Europe now uses 230 volt 50 [Hz AC mains](#) grids and [GSM mobile phones](#), and (at least officially) [measures](#) lengths in [metres](#). The [United Kingdom](#) has officially accepted metres for business purposes but [feet](#) and [inches](#) are still widely used by the general public...Common use of the word standard implies that it is a universally agreed upon set of guidelines for interoperability. However, the plurality of standards-issuing organizations means that in many cases, a document purporting to be a "standard" doesn't necessarily have the support of many parties. As [Grace Hopper](#) said, "The wonderful thing about standards is that there are so many of them to choose from"."

You have an opportunity in Massachusetts to adopt an approved standard that will ensure equal access for everyone, vendor and user alike, to public documents; or you may dilute that standard so that document access, even from a given vendor, is impossible; rendering your efforts meaningless. I trust that you will make a considered and wise decision.

Sincerely,

Thomas Dale Kerby, RA
2947 Preston Street
Salt Lake City, Utah* 84106
(801) 349-2543

I lived, worked, and studied in Boston.

From: [Armour, David L](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF
Date: Friday, July 13, 2007 11:47:49 AM
Attachments:

Hi

I understand that you are considering extending the document standard to include Microsoft's Open Office XML. I respectfully request that you do not include Microsoft's format as an acceptable open format. The reasons for this are the following:

1. The standard is complex and not completely defined. No one besides Microsoft will be able to implement it. A standard can not be a standard if multiple vendors, organizations, etc can not implement it. Think of standard screws and threading. The cost of manufacturing would be extremely high if there were not standard threads. By making OO XML so large and complex it discourages alternative implementations.
2. Incomplete documentation. OO XML contains thousands of pages of documentation, yet there are many aspects which are not well enough defined that anyone but Microsoft could implement it. This is an unfair competitive situation.
3. There is already an open standard (ISO) that was developed by a large and diverse group. This standard should be adopted and promoted and not introduce competing standards.
4. The current standard, ODF, provides all the necessary capability for a document definition. Microsoft has added many more things which detracts from a document standard and are really geared towards the application using the document. This will lead to technical complexity and potential security issues. Complexity does not need to be valued. For instance, 99% of the users of Microsoft Word use about 5% of the features. Many of the additional features while useful to a few also includes some which can compromise a computer, such as Active X components or VBScript.

5. Historical context. Microsoft has used this approach before to eliminate competition. On the OS front, they regularly change APIs in a way that competitive products even running on their systems fall behind either due to lack of documentation or the time it takes to reverse engineer the new API capabilities.

Please reject OO XML as a document format and remain committed to ODF as the sole approved standard document format.

Thank you very much.

David Armour
Architect

From: [Bob Halloran](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Open XML vs. ODF
Date: Friday, July 13, 2007 11:44:28 AM
Attachments:

I'm writing as an IT professional and Massachusetts native regarding the state's consideration of the Microsoft "Open XML" standard as an alternative to the Open Document Format (ODF) selected earlier.

Both are XML-based, however the Microsoft format appears to most as simply a 'wrapper' around their existing, proprietary Office formats. There are various items which are targeted specifically to the MS Office suite with no detail other than "emulate existing <product> behavior". For example:

"2.15.3.6 autoSpaceLikeWord95 (Emulate Word 95 Full-Width Character Spacing)"

"This element specifies that applications shall emulate the behavior of a previously existing word processing application (Microsoft Word 95) when determining the spacing between full-width East Asian characters in a document's content."

.. with no further documentation as to what the Word95 behavior is to be mimicked.

Recent technical news items call into doubt the spec's ability to accurately represent spreadsheet formulas (<http://www.robweir.com/blog/2007/07/formula-for-failure.html>).

This is a rather blatant attempt on the part of Microsoft to give the appearance of "openness" while maintaining proprietary elements in their formats which would preclude competitive products from success.

--

Robert Halloran
Jacksonville FL

"They who can give up essential liberty to obtain a little temporary safety deserve neither." - Benjamin Franklin

From: [Bill Chosiad](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Oppose Ecma-376 Office Open XML Formats (Open XML)
Date: Friday, July 13, 2007 11:30:44 AM
Attachments:

As a life-long citizen of the Commonwealth and a computer technology professional, I am writing to express my opposition to the inclusion of Ecma-376 Office Open XML Formats (Open XML) as a standard for documentation.

I oppose this for a number of reasons:

- 1) The "standard" is flawed and does not conform to other nationally accepted standards for dates, languages, and cryptography. There is a bug in the spreadsheet file format which forbids any date before the year 1900: such bugs affects the OOXML specification as well as software versions such as Microsoft Excel 2000, XP, 2003 or 2007.
- 2) The standard requires support of Microsoft proprietary formats (e.g. Windows metafile).
- 3) The format requires implementation of capabilities that are not covered under Microsoft's "Patent pledge" so support for this format can not be fully implemented without getting a license from Microsoft. There is no guarantee that anybody can write a software that fully or partially implements the OOXML specification without being liable to patent damages or patent license fees by Microsoft
- 4) This standard duplicates features that are found in the OpenDocument document standard, which is rightly being embraced by the Commonwealth. A dual standard adds costs, uncertainty and confusion to the government and citizens when dicisions must be made as to which format to use.
- 5) This specification is so complex (>6,000 pages) and vendor-specific that it can only be successfully implemented by Microsoft. It relies on undisclosed information (e.g., requires that behavior of proprietary applications be cloned without disclosing that behavior). on the other hand, the OpenDocument specification is only 700 pages and is easily implemented by any developer.
- 6) There is no provable implementation of the OOXML specification: Microsoft Office

2007 provides a special version of OOXML, not a file format which complies with the OOXML specification. The only company with the resources to implement this standard is Microsoft. Their implementation is expected to be costly, and only run on the Windows platform, thus discriminating against users of other operating systems, such as MacOS and Linux

7) This standard proposal has not been created by bringing together the experience and expertise of all interested parties (such as the producers, sellers, buyers, users and regulators), but by Microsoft alone.

I'm sure you're aware of this, but additional information about the problems with this "standard" may be found at: http://www.grokdoc.net/index.php/EOOXML_objections

With Microsoft's vast resources, one must wonder why they exhibit such resistance to implementing the accepted OpenDocument standard. I feel there is only one possible explanation for this - they wish to keep people locked into their line of Office products.

There is no reason that the Commonwealth should be pressured to accept this standard. Some of our documents will be around long after the current version of Microsoft Office is but a faint memory. We should not entrust our heritage to a such a proprietary format.

Please help our government and economy by moving us away from dependence on a single vendor - Microsoft - and move us towards an open standards society where vendor specific software is not required.

Regards,

William A. Chosiad
15 Franklin Street
Watertown, MA 02472

From: [Peter Heitman](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ETRM v4.0
Date: Friday, July 13, 2007 11:02:25 AM
Attachments:

I wanted to send in a comment related to the proposed change in the Enterprise Technical Reference Model v4.0 to accept OOXML as an additional document format.

I'm very concerned about this change. ODF is an ISO standard that is fully documented and free for everyone to implement. Concerns have been raised in the past about accessibility and about the ability of existing tools (Microsoft Word) to support ODF. Both of those concerns were taken seriously and multiple efforts have addressed those.

OOXML, while being a 'standard', is not fully documented. The specification references concepts that are not specified within the document but refer to proprietary implementations. 'useWord97LineBreakRules' is not complete documentation and is not an open specification.

As a citizen of the Commonwealth of Massachusetts, I really want to see the adoption of standards that will allow all government documents to be accessible and readable 100 years from now. I personally have no confidence that documents written to the OOXML format (either the current format or ones defined in coming years) will be accessible and readable to the extent that documents written to the ODF standard will be.

Sincerely,

Peter Heitman
Milton, MA

From: [Kevin Cormell](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF adoption
Date: Friday, July 13, 2007 10:57:52 AM
Attachments:

Dear Sirs,

To put it simply (I leave the techno arguments to my more learned colleagues)

Its clear from all the modern advances that have been made in our industry, for example the humble pc (compare to the Commodore Pet) , that only when you have a truly open standard, free of the fetters of commercial interests that you get innovation, progress, backward compatibility & bangs for your public buck.

Do not be taken in by the Microsoft OpenXML's smoke & mirrors, beware of G(r)eeks bearing gifts (so to speak).

Please adopt ODF as your primary archive standard.

regards

Kevin John Cormell

From: [J. Daniel Ashton](mailto:J.Daniel.Ashton@ashtonfam.org)
To: [Standards \(ITD\)](#);
CC:
Subject: Please reject Ecma 376 as a Massachusetts-approved standard
Date: Friday, July 13, 2007 10:48:55 AM
Attachments:

Greetings,

I'm writing to add my voice to those questioning the openness of Microsoft's proposed "standard." According to all that I have seen so far, the Ecma 376 standard, sometimes known as Office OpenXML, is not by any measure an open standard. It is not truly available for other companies to implement and support, despite the misleading wealth of technical documentation.

In addition, Ecma 376 is duplicative of the OASIS OpenDocument standard, and inferior to it.

The decisions that you make are not made in a vacuum. Like primary elections, your choice of document format standards will set a precedent that will influence many other states and organizations. I am a citizen of the state of Maryland, and I am eager to see Massachusetts set a standard for my government to emulate.

Please make a careful choice in favor of long-term, wide-spread document compatability. Please reject Microsoft's bid and Ecma 376.

Thank you for your consideration.

Kind regards,

Daniel

--

Daniel Ashton PGP key available <http://Daniel.AshtonFam.org>
<mailto:Daniel@AshtonFam.org> <http://ChamberMusicWeekend.org>
AIM: FirstFiddl ICQ# 9445142 <http://MDMusic.org>

From: [Brendan](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please reject OOXML's inclusion under the ETRM
Date: Friday, July 13, 2007 10:31:26 AM
Attachments:

The Commonwealth should encourage interoperability* - Adoption of Ecma-376 / OOXML would be a shift away from interoperability offered by ODF because OOXML is a single vendor format that is not interoperable with other formats and applications.

This cannot happen!

From: [Scott Dunn](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ECMA-376
Date: Friday, July 13, 2007 10:29:02 AM
Attachments:

Sirs,

I don't live in the state of Massachusetts, but your decisions affect the rest of the states with regard to office document formats. Thus, I felt motivated to at least put my two cents in.

First, this standard is intended to preserve existing documents created by a single vendor, Microsoft. That should be the responsibility of Microsoft from the beginning. History is replete with examples of Microsoft creating a new version of their software that cannot open documents created by an earlier version. So when Microsoft decides to change their standard, what happens to the rest of us?

Second, we need only one standard. I like to use the analogy of construction standards. There is only one Uniform Construction Code. Many states adapt that code for their own purposes and environments. Nevertheless, it's just one standard that everyone can rely upon. But if there were two standards, then we'd spend a lot of time converting units of measure from one to the other, or comparing two or more standards to arrive at a solution. If we have more than one standard for documents, we will waste many hours converting documents and correcting mistakes in the conversion process.

Third, patents. Microsoft has asserted that open source software violates their software patents. The implication is that certain office suites such as Open Office, violate their patents. Then it follows that if Open Office violates their patents, and the patents encumber the ECMA-376 specification, the standard could not be implemented by anyone who has not paid the toll to Microsoft. We have come to know this as the Microsoft tax.

Last, the full burden of implementation. The ECMA-376 standard is 6000 pages long. It also uses references to formatting techniques that are not fully documented within. There are numerous articles on the internet to suggest that Microsoft is the only vendor capable of creating a true implementation of the standard. So again, we are looking at a standard that is controlled and implemented by a single vendor.

That is known as vendor lock-in. Anyone wishing to view ECMA-376 documents will need to buy Microsoft software for complete fidelity in creating and viewing such documents.

I stand opposed to the use of this standard. Please exclude it from the ETRM.

Thank you.

Regards,
Scott Dunn
Student, writer, comedian and vegetarian

In friendship, I like you not just for who you are, but also for who I become when I'm with you.

From: [Jim Capp](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OOXML
Date: Friday, July 13, 2007 10:25:46 AM
Attachments:

Dear Massachusetts,

OOXML is a mistake. A huge mistake being created solely by Microsoft *FOR* Microsoft. In spite of the fact of lip service claiming support from 1,150 partners in 50 countries and six continents supporting Ecma-376, how many are actually able to offer a product meeting those "standards"? ... None. The only thing close are a class of "converters" which we all know will be inferior to the native format, because of the simple fact that the "standard" is far too complex for *anyone* to understand, let alone implement.

Respectfully,

James A. Capp, CEO
Anteil, Inc.
(717) 671-1141 x 22

From: [Jim Sansing](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Re: Public Comment on ETRM Draft 4.0
Date: Friday, July 13, 2007 10:24:35 AM
Attachments:

Information Technology Division
Commonwealth of Massachusetts
Attention: Beth Ann Pepoli

Ms. Pepoli,

When I was working as a county government employee here in Maryland in the 1980's, I wrote the specifications for modems to be purchased for our Fire Dept. The line speeds had recently been increased by using new algorithms, and there were no independent standards defined. Therefore, I had to refer to the 'de facto' standard of the time.

Unfortunately, one of our main requirements had been eliminated by the manufacturer in the new devices. We did not discover this until the modems had been purchased, and without an independent specification to reference, could not hold the supplier accountable. Ever since, I have been adamant about independent standard specifications.

ECMA 376, commonly known as OOXML, is essentially a 'de facto' standard since it was approved without changes after submission by Microsoft. Additionally, there is evidence that the specification refers to definitions that are not independent standards.

My experience with government purchasing requirements leads me to view ECMA 376 as a less dependable standard than ISO/IEC 26300:2006. Because many state and local governments will learn from the experience that Massachusetts has in implementing documentation standards, I encourage you to hold to the most stringent requirements.

Thank you and best wishes.

Jim Sansing

Senior Partner
Ritasa LLC

From: [Mark Anderson](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Microsoft OpenOffice XML
Date: Friday, July 13, 2007 10:17:43 AM
Attachments:

I'm a computer professional with over 25 years of experience in software development and computer use. I've worked on a wide variety of hardware and software. I've participated in standards committee work related to international aviation communications and protocols for both ISO and ICAO.

The idea that the Microsoft OpenOffice XML can be considered an "open" standard is ridiculous.

Wording in the specification makes it clear that it must support undocumented legacy features that only Microsoft has knowledge of. It also specifies redundant new formats for encoding certain types of information that have previously be developed into other International Standards. This is hardly "open". It is also incomplete and filled with errors.

There is no certified implementations of this specification. Microsoft has never stated that it's current office application even implements OOXML. Technical errors, omissions and ambiguity in the specification would further suggest that it can't possibly have ever been implemented as specified.

Finally, I do not and will not use Microsoft software products due to their poor capabilities, performance, and security vulnerabilities. How can I, as a consumer of government services, interface with e-government when the computers I use will not be able to read the documents provided by my government?

There is an approved International Standard for office applications, ISO 26300 (ODF). If there are deficiencies in this specification then the proper course of action would be for interested parties to enhance ISO 26300. It's completely

unrealistic to expect a specification to be created 100% complete and correct during it's initial development.

I urge you to reconsider your proposed acceptance of OOXML as an "open" standard for use in Massachusetts since this will set a bad precedent for other local, state, and federal government agencies.

Respectfully,

Mark Anderson
Senior Computer Scientist
Computer Sciences Corporation
PO Box 663
Cologne, NJ
08213

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From: [Joseph Eattimoottil](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Documents standards
Date: Friday, July 13, 2007 10:03:12 AM
Attachments:

Sub: Document Formats.

Dear Sir/Madam

As a MA taxpayer, I think it's important for us to preserve the human history in a human readable form forever. By writing to the standards body, I hope that you will further investigate the openness of OpenXML to preserve such documents.

Thank you for your kind consideration.

Joseph B Eattimoottil
107 Brook St
Franklin, MA 02038

From: [Karl Bellve](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Please don't accept OOXML
Date: Friday, July 13, 2007 10:02:57 AM
Attachments: [Karl.Bellve.vcf](#)

I am a researcher at the University of Massachusetts and I am concerned that you are considering OOXML as an open document format. An open document format needs to be vendor neutral, without proprietary extensions and without undocumented terms (See "2.15.3.6 autoSpaceLikeWord95").

It is very important that documents scientists write today and tomorrow will be readable by future generations which is why our group has switched to ODF. But, I am afraid if the ITD doesn't set an appropriate example, many scientists will continue to document their work in Microsoft products only later to find their documents and data unreadable. If Microsoft drops support for those formats, who will support them? If someone attempts to read those formats, how can they due to poorly defined definitions?

It is clear that only one open document format should be supported. Dueling formats only lead to confusion and delay. ODF is vendor neutral, without proprietary extensions, clearly defined and supported by the international community. Can you say the same about OOXML?

From: [Luigi Bai](#)
To: [Standards \(ITD\)](#);
CC:
Subject: OOXML - comments
Date: Friday, July 13, 2007 9:55:47 AM
Attachments:

Hi,

I'm writing as a citizen of Texas, another state which is considering passing executive rules and/or legislation requiring the use of open standards for document formats for official documents.

I understand that Massachussets is considering accepting ECMA 376 as an open standard. I believe this would be a poor choice for many reasons, especially given that this proposal describes a large amount of the format's functionality in terms of the behaviour of obsolete versions of proprietary software (dates function like bugs in Excel, formatting options that behave like Office 95, etc.). These "specifications" cannot be met by competing implementations of the "standard" without access to these obsolete versions of software, and in some cases without reverse engineering those programs. Another major objection is the realization that there are not currently, and are not likely to be in the short term any implementations of ECMA 376 except for Microsoft's (and even their Office software is not yet compliant).

Despite all the valid and currently unanswered objections to OOXML, and assuming that ECMA 376/OOXML finally is ratified as a global standard, I'd suggest that Massachussets should insist that any documents generated by an implementation of OOXML should conform strictly to the standard *without proprietary extensions*. This at least makes it possible for the Commonwealth to access the documents at some future date with a competing implementation, should Microsoft no longer support the software which generated the documents in the first place. If you allow documents to be "mostly ECMA 376" then you are doing your Commonwealth a disservice; you are not improving the document situation much over using the proprietary MS .doc formats.

In the end, I really see no justification for allowing OOXML as a document format. Even Microsoft editors will support ODF via plugins and converters,

so I don't see any rationale for allowing any other format for official documents.

I applaud your open process for discussing this vital technical issue, and hope we can help institute a similar discussion in my state.

Thanks;
Luigi Bai
Houston, TX

From: [Jonathan Ramsay](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Another person hoping that the standard is open
Date: Friday, July 13, 2007 9:49:49 AM
Attachments:

Hello Standards Board,

As I am sure there are many emails, here are my add 2 cents. An "open" standard should stand "own its own" - to envoke cliche. PDF is do that, XML does that . Microsoft's continuing struggle to both include everyone and provide their customers a different (improved) functionality and myraid issues with past MSOffice flaws and legal history should all weigh against their "open " standard. Thanks for your time -
Jon Ramsay

From: [mark salisbury](#)
To: [Standards \(ITD\);](#)
CC:
Subject: open file formats
Date: Friday, July 13, 2007 9:16:41 AM
Attachments:

I understand that you are in the process of defining what "open" file standards will be approved for use by the state government, with an eye towards ensuring that public records not be held prisoner to proprietary file formats, software programs and etc.

I also understand that you are considering adopting Microsoft Corporation's OOXML file format as defined in ECMA standard 376.

There are some major problems with this "standard" that make it unsuitable as a public records storage format.

Firstly, it is encumbered by numerous patents which Microsoft has not made available to the public domain. This means that if you want to implement a commercial software program that uses OOXML, you MUST pay a licensing fee to Microsoft, at an unspecified cost, and there is no guarantee that they will even license it to you. They have pledged "not to sue" anybody for open source, non-commercial implementations, but in reality, since no government agency is going to buy/use a software product without a company behind it, this pledge is meaningless. If the State buys Microsoft and it's OOXML, it will forever have to pay a "Tax" to Microsoft in order to maintain access to public records, because there will never be another commercial software vendor able to bid for the State Software contracts. I don't want my tax dollars wasted that way.

Secondly, the ECMA 376 standard has been described as a dictionary without definitions, or a phone book without phone numbers. It tells you what the elements are that make up a valid OOXML schema, but it doesn't tell you what they mean, or how they are to be interpreted. What this means, in practice, is that anybody attempting to write an OOXML interpreter HAS to have Microsoft proprietary knowledge OR spend years reverse engineering the correct behaviors by trial and error.

Thirdly, OOXML is designed from the ground up to preserve for all eternity the idiosyncrasies of a single vendor's historical file formats in order to preserve a proprietary competitive advantage, not to present a standard way for all vendors to represent a document, in an open, well defined way that ensures the state will have access to multiple vendors providing tools for working with the same data.

Fortunately, there is a truly open and patent unencumbered file standard available. It is called ODF, it is an ISO standard (ISO/IEC 26300) vs. an ECMA standard, (which carries a lot more weight. companies go to ECMA when they cant get ISO to buy what they are selling). ODF is already supported by DOZENS of software tools, some free/open source, some commercial/open source and some commercial/closed source.

There are good tools for converting old proprietary format data into ODF documents, there are good tools for converting ODF documents back to proprietary formats.

There is no good reason, other than bribery from Microsoft, for the state of Massacussetts to approve OOXML for use as an "open" file standard for use by the state government.

--

Mark Salisbury

From: [McCoy, George Kenton](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Choose ODF for the Taxpayers of Massachusetts
Date: Friday, July 13, 2007 9:05:38 AM
Attachments:

Dear Sirs/Madames --

I am not a citizen of Massachusetts, but I did live in Boston for a few months in the 1980s, I used to work professionally as a software documentation specialist, and I have followed your quandary with great interest. It seems to me that you have a responsibility to find ways to archive all public digital records in a way that will allow them to be read and used in perpetuity AT NO ADDITIONAL ONGOING COST to the taxpayers of your state. Let me clarify that further: if you choose Microsoft's OOXML -- a transparent attempt by them to preserve their monopoly document formats, which are proprietary -- Massachusetts will forever have to upgrade to whatever Microsoft's latest operating system is just to use the documents.

OOXML is NOT an open format and should not be considered a standard in any way (regardless of what the bought-and-paid-for ECMA reps decide). By contrast, ODF IS open, IS an ISO standard, and does not now and will never require ongoing application/operating system purchases for continued use. This is really the crux of the matter: are you going to "tax" the citizens of Massachusetts in perpetuity to see and use THEIR OWN documents?

Your dilemma is this, and it has been well documented: Microsoft has pressured nearly everyone in the Massachusetts state government to oppose ODF because they know it is superior to their offering. Do you have the courage to ignore the political pressure you are under and choose what is better for Massachusetts taxpayers? I am hopeful you will find the courage, and I wish you the best in your struggle.

You have probably already seen it, but if not, here is a link to an excellent Web site that lays out many more points about OOXML vs. ODF.

Please give it a look if you have a chance.

<http://www.groklaw.net/staticpages/index.php?page=20051216153153504>

Sincerely,

George McCoy
Lawrence, Kansas
Former Technical Writer

From: [Edward J. Huff](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Oppose adoption of Microsoft's OfficeOpen XML
Date: Friday, July 13, 2007 8:59:37 AM
Attachments:

Although this so-called standard may have been adopted by some international standards organization, it lacks the most important part of a standardized format: a free open source reference implementation. Also, the standard does not forbid the use of closed formats within itself.

--

Edward J. Huff <ed at huff20may77.us>

From: [Mike MacAdam](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Microsoft's Office Open XML specification isn't open
Date: Friday, July 13, 2007 8:55:47 AM
Attachments:

Sir/Madame

I am far from a Microsoft hater but I believe the Open XML specification shouldn't be a standard for two related reasons.

- It isn't fully specified
- It is only implemented by one vendor

Massachusetts gains no advantage by accepting Open XML as a standard when it doesn't meet the criteria.

regards

Mike MacAdam

From: [Peter Fusco](#)
To: [Standards \(ITD\);](#)
CC:
Subject: re: OOXML adoption
Date: Friday, July 13, 2007 8:44:36 AM
Attachments:

I am writing to you regarding this issue because it is my belief that Microsoft is simply looking for another method of controlling their document format lock.

As you know Microsoft Office is the bread and butter of their company. They manage to keep their dominance in this market by closing off the format. OOXML is simply an attempt to retain that dominance by offering an alternative to ODF which is a universal open standard that all word/spreadsheet applications can use, no matter who the publisher is.

If those reasons are not enough to consider OOXML unsuitable, then consider the flaws, contradictions and fallacies within the OOXML documentation.

Please do not cave into Microsoft's lobbying. Be strong, be honest and most of all be true to the citizens of MA. They deserve the best technology and OOXML is not that by a long shot.

Sincerely
Peter J. Fusco

From: [Chuck Stickelman](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Standards
Date: Friday, July 13, 2007 8:43:17 AM
Attachments: [image001.jpg](#)

To Whom It May Concern,

This letter is in support of truly open standards. I have been in the IT industry for 30 years, and have witnessed a movement towards truly open standards. I believe that Microsoft's OfficeOpen XML specification is not truly open. I do not believe that a developer could read the specification, and without signing a non-disclosure agreement, write an application that would completely conform to that specification. This view is not unique.

Please think very carefully before officially including the Microsoft OfficeOpen XML specification in you State's list of usable "open standards".

Thank you,
Chuck Stickelman
Advanced Systems Sales Engineer
[cstickelman at mtbt.com](mailto:cstickelman@mtbt.com)



(419) 529-2444 ext.7134
(800) 472-5844
(419) 529-6833 fax

From: [Ivars Krastins](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Opposed to ECMA 376 as a standard
Date: Friday, July 13, 2007 8:41:08 AM
Attachments:

I am vigorously opposed to having Microsoft's ECMA 376 as an XML open standard, as it is not an open standard.

From: [jerry.feldman at algorithmics.com](mailto:jerry.feldman@algorithmics.com)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Document format
Date: Friday, July 13, 2007 8:35:52 AM
Attachments:

To whom it may concern;

The ISO/IEC 26300 Open Document Format is a worldwide format for documents that in my opinion should be the primary format for Massachusetts documents along with Portable Document Format (PDF) which is by itself a long time interoperability standard.

I oppose the addition of the Microsoft EOOXML (ECMA-376 Office Open XML File Formats). The main reason I oppose this format is its lack of interoperability with non-Microsoft tools, such as OpenOffice.org. I'm certain, people like Andy Updegrave have stated some very specific objections. My objection is that this format is far from open in that it requires a license.

I would hope that Massachusetts do the right thing originally proposed by Eric Kriss' in 2005, and adopt ISO/IEC 26300 Open Document Format as the official Massachusetts document format and reject ECMA-376 EOOXML.

--

Jerry Feldman <Jerry.Feldman@algorithmics.com>
Algorithmics (US), Inc
275 Grove St
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Newton, MA 02466
617-663-5220
617-663-5391 (fax)

Register today for the Algorithmics Risk Conference 2007, September 24 - 26, Cannes, France.

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From: [Lewis Mettler](#)
To: [Standards \(ITD\);](#)
CC:
Subject: multiple so called standards
Date: Friday, July 13, 2007 7:48:06 AM
Attachments:

Attention concerned governmental organizations:

The absolutely worse thing that can happen to standard file formats is to approve or support multiple choices.

Two documents standards is NOT better than one and can only increase the cost for all to deal with documents.

And the whole idea of an open standard is to make it completely and fully available to all without any restriction what so ever. That will never be the case when one vendor controls it completely or even partially.

If a viable standard can not handle legacy documents then it is the burden of the vendor who created those legacy documents to bring them forward into an open standard.

The value proposition of a truly open document standard completely available to all is enormous. But, a restricted standard will only cause pain, frustration and increase costs for everyone.

Individual vendors have to be forced to work together to define a single, compatible, interoperable format for word processing files. And governmental agencies of all kinds have to take the lead in that regard and insist that they do so.

No standard is open if it is NOT open to me or is restricted in any way such as defective or missing documentation or unclear definitions. Any possible patent restrictions, copyright restrictions, EULA agreements or simply incomplete definitions preclude everyone else.

Any vendor who claims that multiple standards is better than one is fully obligated to prove that claim. And that can not be done. It was

not better when WordPerfect and Microsoft Word were equally prevalent. That was untenable. And indeed contributed greatly to the demise of WordPerfect simply because consumers had to make a choice.

You can not adopt two incompatible formats without forcing all consumers to again make a choice and eliminate one of them.

--

Lewis A. Mettler, Esq. (Attorney and Software Developer)

lmettler at lamlaw.com

<http://www.lamlaw.com/>

From: [daly at axiom-developer.org](mailto:daly@axiom-developer.org)
To: [Standards \(ITD\)](#);
CC: [daly at axiom-developer.org](mailto:daly@axiom-developer.org); [pj at groklaw.net](mailto:pj@groklaw.net);
Subject: Open Standards and Data Preservation
Date: Friday, July 13, 2007 7:08:34 AM
Attachments:

Committee Members,

I am not a resident of Massachusetts. However, I have been following the controversy over the use of Open Document Format since Eric Kriss gave his speech on Open Formats in January, 2005.

I am a computer programmer with 36 years of experience. My resume and current projects are available at <<http://daly.axiom-developer.org>>. I have been actively involved in open source work since 1997.

I applaud your attempts to consider the long term impact of document format on the issue of document storage. This is an important detail for long term access to public documents. A resident should be able to read their electronic birth certificate when they celebrate their 100th birthday, an all-too-likely occurrence.

I am deeply concerned that you have considered using OOXML in addition to ODF. OOXML is not an open document format. I have looked at the details of the published specification. There are "binary" parts of the format that are not well specified and cannot be implemented. That means that you will save birth certificates in a format that cannot be read in 100 years if Microsoft does not exist.

Ask yourself two questions: How many companies exist more than 100 years? Why would you risk the future of your birth certificate?

There comes a time when it is necessary to "do the right thing". Saving public documents in a fully open standard format is clearly the "right thing". Please remove OOXML from your choices. It is not, in my professional opinion, an open standard format.

Thank you for your time.
Tim Daly
daly at axiom-developer.org

From: [Ken King](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Microsoft OfficeOpen XML specification (now Ecma 376)
beware of Greeks bearing gifts
Date: Friday, July 13, 2007 6:47:44 AM
Attachments:

To the State of Massachusetts.

RE: Microsoft OfficeOpen XML specification (now Ecma 376) beware of Greeks bearing gifts

We have over 100,000 documents going back 25 years most of which are Microsoft and there's nothing that can read them, not even Microsoft's products. Archivist, historians, and other are going to hit huge black hole in human knowledge when they get to the 1980's and find that there are no readable public records to examine and develop historical perspective on public events.

As far as I can figure out Microsoft's OfficeOpen XML (now Ecma 376) his a huge guise to hide documents in proprietary un understandable XML formats that no one else 20 years from now will be able to read, much less a 100 years from now, which probably long after Microsoft is gone.

You have a duty and responsibility to find ways to archive all public digital records in a way they can be read way into the future.

From where I am, pdf's seem to be pretty good. They can be generated, stored, mailed, and read on all computer platforms; i.e. Mac, Windows, Linux, Unix, etc. There is an OpenODF XML standard which works for a lot of things.

I'd like my great grandchildren to be able to read public electronic records the way many people doing genealogy are doing with microfilm and paper documents today.

Kenneth King

From: [Patrick Hart](#)
To: [Standards \(ITD\);](#)
CC:
Subject: RE: MS OfficeOpen XML
Date: Friday, July 13, 2007 6:25:31 AM
Attachments:

Good day,

I am a hardware & software engineer and small business owner and I wanted to voice my concerns about using the so called 'open standards' from Microsoft who has a long history of promising anything for a sale and then failing to deliver. I do not believe any government or agency should be put into the uncomfortable position of being held hostage by a vendor. If the Office XML format is not public domain, your documents are vulnerable to being held for ransom unless you and anyone else who needs to access your documents have the same version capabilities of the product that created your documents. My honest advice is to mandate that any document solution you choose must be public domain, be fully implemented in a current product (not vaporware) and be endorsed by the Open Source community who develop a large amount of interoperable software that is critical to a growing majority of companies and governments.

Patrick Hart
President - SoftTech, Inc.
Warner, New Hampshire

From: [Maurice Shakeshaft](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Adoption of Open Document Format (ODF) standards
Date: Friday, July 13, 2007 6:18:21 AM
Attachments:

Hello & good morning from UK,

I hope you will excuse this contribution from a non-state resident or taxpayer.

I read recently that Massachussets is in the forefront of the adoption of ODF standards in public institutions in the USA and wish to both compliment your legislators and official for this and urge you to continue.

Proprietary formats are great while they last but almost always evolve into, or make way for, international and open standards. Massachussets has a proud history of defense and innovation - as a Brit, I know this - and I hope and trust you will continue to support ODF standards.

Many thanks.

Rgds.

Maurice Shakeshaft

--

Maurice Shakeshaft
CB Automation Ltd.
Company Registration No. - 03620231
Registered Address FosseWay, NG22 8LA, UK
0(044) 7970 727 053

From: [Robert McClintock](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Great Concern - Open Documentation Standards
Date: Friday, July 13, 2007 5:41:21 AM
Attachments:

Sirs,

I took great comfort in your intention to define standards of documentation.

I would like to urge you not to consider that Microsoft documents be considered as an open standard they cant even maintain a standard across their own document types i.e. MS Works vs MS Word. This is not a mere oversight, it goes to the root of the problem, i.e. the understandable MS commercial approach. This is understandable in commercial terms but is precisely why an open standard is required and must not be fudged for pragmatic reasons. The future is not for sale, even IBM is only a ghost of what it was; DEC has gone and who knows how long will Microsoft have the influence that it has now. Even it didnt foresee the explosion of the internet and attempted to hinder Netscape and WWW etc. Even now the HTML that results from conversion a word file looks very proprietary.

Microsoft will not conform to a world standard until it is forced to for commercial reasons. it never has before so why should it start now as a major player.

To sum up I urge you not to allow the wishes of the predator be imposed on us (the prey) when it comes to setting standards, Stand up to the bully!

Robert McClintock

IT Department
DX 1
Iver, Bucks

T: 01753 631365
E: Robert.McClintock at thedx.co.uk
W: www.thedx.co.uk

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From: [drseuk at sdf-eu.org](mailto:drseuk@sdf-eu.org)
To: [Standards \(ITD\)](#);
CC:
Subject: ODF and OOXML
Date: Friday, July 13, 2007 5:15:21 AM
Attachments:

Hi,

I've been following this debate for some time now and have corresponded with a pleasant lady in your office on the issue previously (notably pointing her towards groklaw where she was being discussed in the context of the Commonwealth's previous ODF adoption discussions). I can't recall her name but thank her for personally responding to me despite me not being a US citizen (I hail from the UK across the pond).

With my background in government central IT strategy, the issues I'm thinking this time around are:

1. Given the rapid move of Europe to open source software (e.g., Firefox which is getting up to 30-50% in some EU countries and specifically Ubuntu and OpenOffice), interoperability with your major trading partners via a well-designed, well thought out, community-driven and peer-reviewed document format such as ODF would seem logical.
2. It is widely perceived (correctly in my opinion) that the standards procedures are being perverted and short-circuited to bolster Microsoft's confusingly named OOXML which is little more than an attempt to maintain commercial monopoly lock-in by attempting to standardise legacy Microsoft formats. I would look very closely at the proposed 6,000 or so page OOXML standard and request that ANSI / ISO apply the same degree of rigour to it as they would apply to any other standard. (I'm sure MIT can help here!)
3. On a practical note, I have personally written XML import and export filters to / from ODF and it's logical and straightforward (well, at least for anyone versed in XSLT!). Can the same be said of OOXML? Definitely not. The OOXML specification is confused and unclear on many points and (speaking as a programmer) you feel like you're

trying to see the wood from the trees. This directly means reduced service and greater costs for citizens.

4. The suggestion that ODF is lacking in terms of spreadsheet functions is mere FUD by Microsoft and a red herring. It is evident that such functions as proposed by OOXML are woefully inaccurate and that the proposed considered, consensus-based, peer-reviewed, approach to implementing such functions in ODF (even if it takes a little longer as all good things do) is far preferable to the frankly rushed "dog's dinner" approach trumpeted by OOXML.

In summary:

Do you want a lean, mean and clean ODF document format that has been carefully considered by all relevant parties (computer scientists, the standards bodies, the community) with emphasis on ease of use for the end-user, programmer and of ultimate material benefit to US (and other) citizens? If so, choose ODF.

or

Do you want a rushed, ill-thought out stamp of approval of a bloated, inaccurate and baroque proprietary format that will reduce productivity for the end-user, increase costs for interoperability and ultimately benefit noone? If so, choose OOXML.

Regards,

James

--

drseuk at sdf-eu.org

SDF-EU Public Access UNIX System - <http://sdf-eu.org>

From: [Ken Zahorec](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please consider only open file formats...
Date: Friday, July 13, 2007 4:05:52 AM
Attachments:

Dear IT representative,

Please reconsider your inclusion of the Microsoft XML document format into the Massachusetts state IT plan. The Microsoft format should not be allowed as a choice. The Microsoft XML format has no place in an open document policy. It is not an open standard and is being developed and promoted only to further Microsoft monopoly interests at the expense of everyone else, including the good people and businesses of Massachusetts. The Microsoft format is riddled with conflicts and bent towards promoting monopoly interests.

In order to be considered, Microsoft should be required to design their products to be fully compatible with ODF data format, an ISO standard documentation format that is freely available to use for all and is already available in many open source and proprietary products such as OpenOffice.org word processor, Sun Star Office, many IBM products, and many other open-source products.as well.

The world is watching. Please make the right choice and do not allow Microsoft to dictate your IT documentation policy. Choose only open and free formats, such as ODF.

<http://www.odfalliance.org/>

Thank you,
Kenneth W. Zahorec

--

Kenneth W. Zahorec
<kzahorec at neo.rr.com>
Mozilla-Thunderbird on Mepis Linux v6.0
Discover Linux today. You'll be amazed!

From: [David Mehrmann](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open standards document decision
Date: Friday, July 13, 2007 4:05:22 AM
Attachments:

Dear Sir or Madam,

I've read in the news this morning that a decision is going to be made soon about whether the Open XML specification submitted by Microsoft or the ODF Open document format submitted by the Open source community is apparently chosen for statewide use for the foreseeable future.

After comparing the two options I must say, this is one of the few political decisions that concern me, both for ethical and personal reasons. And so I've simply decided to tell you about it.

Personally, as a citizen, and as an experienced computer expert, I do believe that choosing the actual open path, meaning the one the open source community has come up with, is the one good to go with.

This doesn't mean that the XML format Microsoft has submitted isn't fit to do the job. But their proposal isn't really Open, as people like me cannot simply ask Microsoft how it works in it's entirety. People like me will not be given all of the answers that we need.

With a real open format, every man or business can - if they wish to do so - fully understand the composition of any document, it's internals, in every detail they have a need for.

On a functional basis alone, both formats are just fine.

However please do not underestimate the foundation of openness about documents, and choose what you believe will truly be the wiser choice in this matter.

Sincerely,
David Mehrman

From: [Nicolas Mailhot](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Public Comment on ETRM Draft 4.0
Date: Friday, July 13, 2007 4:03:19 AM
Attachments:

Dear Sir,

I'm quite surprised by the fact the Commonwealth of Massachusetts is considering addition of Ecma 376.

Apart from the fact it's not an open standard by any honest definition (and I'm working with enough big name software vendors to distinguish reality from spin) it's also very obviously a temporary format that will have the same fate as the Office 2003 formats (retired before getting any real third-party tool support). So it's a very bad investment mid-term.

All the technical objections to Ecma 376 (promoting Microsoft bugs above international standards, abusing XML so no generic XML tool will be able to process the files, etc) will have to be addressed sooner or later, and any organisation foolish enough to produce a corpus of Ecma 376 files will face an expensive conversion project mid-term.

When ECMA writes "OpenXML is designed to represent the existing corpus of documents faithfully" I read it as "Microsoft has not figured a way to read its old files reliably so it'll store old attributes in the new format in the hope it will be able to do something with them in a future Office version". No one but Microsoft is in the position to ever do something with these legacy attributes. Microsoft has no incentive to clean them up as long as they help excluding would-be competitors from the Office market, and customers are foolish enough to buy its products on the promise it may change its habits someday.

Massachussets would be better advised to add Office 2000 formats to ETERM if it really wishes to accommodate Microsoft objectives over its best interests. These formats has never been formalized, but many third party-tools can more-or-less reliably read them. And the

Commonwealth of Massachusetts is likely to already have many documents in these formats, so it's not as if their conversion to a real long-term format won't have to be tackled someday.

The OpenXML farce is fooling no one, pretending Ecma 376 is Open or properly standardized won't magically make it so. If ETERM's integrity is to be compromised at least compromise it for a technically viable solution.

Introducing two new overlapping office formats would never have been good for IT users, but Ecma 376 is not even trying to be a good technical container or fix its glaring flaws through standardization. It has no place in any properly managed information system.

Yours truly,

--

Nicolas Mailhot
Software Architect

From: [Charles D Hixson](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OOXML is not suitable to be a standard
Date: Friday, July 13, 2007 3:46:23 AM
Attachments:

Microsoft has defined OOXML in such a way that only a full implementation is proof against being sued for patent violations, and also so the only Microsoft, if even they, can do a full implementation.

E.g., a part of the standard requires displaying a MS Word98 document in the same way the MS Word98 did, without defining what that way was. (And since it's proprietary code, you aren't allowed to know.)

Now just try to imagine the problems with implementing that "standard" on a machine or operating system under which MS Word98 never ran. I submit that it's unlikely that even Microsoft could do so. More unlikely that they would choose to. But only Microsoft is immune to the threat of being sued for violation of Microsoft's patents, and if you don't do a full implementation of the standard you aren't covered.

There are many other reasons why OOXML is not suitable as a standard, and I assume that you will be hearing about many of them. But that's one.

From: [Augustus Saunders](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Acceptable Office Document Standards
Date: Friday, July 13, 2007 2:27:55 AM
Attachments:

Dear Sir or Madam:

I understand that you are deliberating over which Office Document Standards (or proposed/pending standards) are acceptable for use by the Massachusetts State Government. While I am not a Massachusetts citizen, I am a United States citizen, I look forward to a time where my family and I can exchange documents with our own state governments, the federal government, and other state governments (including Massachusetts) using well defined, open document standards. This is important to me because I believe that open document standards are critical for transparency, equal access, and longevity; things that are vital in a modern democracy. Additionally, as a tax-paying citizen and consumer, I look forward to benefiting, together with the government, from better prices and services engendered by the competition that arises from open standards. And lastly, as a professional Software Developer working in a small business environment, I look forward to profiting from said competition myself.

I am writing to you today because all of these benefits that we stand to gain will only be attained if the standards used are actually open, well defined, and non-discriminatory. I understand that you are currently considering the suitability of MicroSoft's "Office Open XML" format, recently ratified as Ecma 376. MicroSoft is in a peculiar position as the dominant vendor of electronic Office Document applications of having a "de-facto" standard while the minority competitors in the marketplace support and back the official ISO standard. In response to the calls for an open format, MicroSoft presented MSOOXML to the Ecma for standardization rather than working with the pre-existing ISO/IEC 26300 (known as "Open Document Format" or ODF). Now that Ecma has accepted it, we must examine it for suitability, in particular whether or not it offers anything of value

that ODF, the existing standard, does not.

Keeping in mind the goal of having an open, well defined, and non-discriminatory standard, it is my personal and professional opinion that MSOOXML is ill-conceived and defeats the purpose of having an open standard. While there are obviously many things that MSOOXML has that ODF does not, the worthwhile ones could be added to ODF with acceptable effort--and much less verbosity. There are a great many deficiencies in MSOOXML that make it inappropriate as a document format for a democratic government or its citizens. Even at many thousands of pages, the specification simultaneously under-specifies many things and discriminates against anybody who is not MicroSoft. There are a great many elements in the specification that refer the reader to the behavior of MicroSoft products, such that conforming would require reverse engineering them. This is antithetical to the purpose of an open standard, and when said product is made by the principle author of the standard, there is no reason to accept it. In fact, the existing converters from MS Office documents to ODF documents amply demonstrate that things like "autoSpaceLikeWord95" are the responsibility of the document converting program and have no business being in the document standard. The layout and/or behavior should be deduced once and output in a standard format, once and for all time. Obviously, any reference to a specific application will soon be obsolete--in fifty years, who will know how MS Excel 2000 calculated a given function or how MS PowerPoint 97 played a given animation? In a format meant to be transparent and have a long shelf life, we should undertake to divest ourselves of these legacy encumbrances while the applications, layout, and behaviors are still fresh, still available, still discoverable. We should strive to create documents today that are accessible to everyone now, five, ten and fifty years in the future, without needing a degree in software history.

Given that we have a perfectly serviceable international standard in place, I believe we should resolve to improve ODF as needed and reject a fundamentally flawed MSOOXML that is a dollar short and a day late. It fails to server the purpose of an open standard: we would still be dependent on MicroSoft and their products today and in the future, we would not save any money from increased competition, and my employer would not be able to profit from an open, fair marketplace. I very much appreciate your time and consideration. Thank you for reading-

Sincerely,

Augustus Saunders
Project Manager
Verilogix, Inc

From: [Keh San](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Regarding Microsoft's OfficeOpen XML specification
Date: Friday, July 13, 2007 2:20:51 AM
Attachments:

I've followed the matters regarding the Microsoft OfficeOpen XML specification and I just want to point out that the standard isn't fully open as long as it's allowed to have Microsoft proprietary data embedded in the document. It creates a skewed market place.

Sincerely,
Keh San

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From: [Bardia Fallah Behabadi](#)
To: [Standards \(ITD\);](#)
CC:
Subject: open standards
Date: Friday, July 13, 2007 2:20:50 AM
Attachments:

Hello,

Don't be fooled by the word open in OfficeOpen XML file standard. We already have a wonderful open document standard in ODF, open document standard. And there are MS Office plug-ins already available for nearly all existing versions of MS Office. It's just a ploy by Microsoft to force purchase of their latest office suite, "Now, it's good for you!"

So use the ODF standard for now in existing MS Office suites and later transition to Open Office. No new training needed for now, just a new file 'save as' format and it's business as usual. A couple yrs down the line when Open Office has thoroughly out innovated the MS Office suite make the relatively painless transition to free Open Office.

Good Luck,
Bardia

From: [Andrew Hougie](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Public Comment on ETRM Draft 4.0
Date: Friday, July 13, 2007 1:48:35 AM
Attachments:

I urge the Information Technology Division to refuse to include Ecma 376 on its approved list. It seems to me that the Commonwealth of Massachusetts is leading the World on setting standards for Government on preservation of electronic documents and approval of Ecma 376 would not have this effect.

--

Andrew Hougie
Grinton
5 Aldenham Grove
Radlett
Herts WD7 7BW
UK

From: [Bill Denney](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ODF vs. OOXML
Date: Friday, July 13, 2007 1:37:59 AM
Attachments:

I would like to add my support for ODF over OOXML. I'm sure that you've heard tons of arguments on the subject so far, but a true, open standard that anyone can interoperate with (as opposed to OOXML that incorrectly and imprecisely defines formulas and uses features that are contrary to widely used standards). Also, it would be nice to have a standard whose basis is not defined based on the bugs of previous versions of programs (the fact that OOXML dates formula fail to account for the days in 1900 should be of concern for anyone who has records that go back that far or farther, such as your state).

I'd like to support you holding your ground in keeping ODF as the standard format so that a true document standard can be used for the future as opposed to a standard that will only help to preserve Microsoft as the only possible vendor. Your use of ODF will likely help other states to adopt similar initiatives allowing office formats to have the same freedom that HTML gave to the web (imagine how the web would be if you could only use a single vendor's products to access it).

Thank you for reading,

Bill Denney

(I was born in Boston, though, I'm unfortunately not a current resident of the state.)

From: [Chuck LeDuc](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Oppose Office Open XML standard
Date: Friday, July 13, 2007 12:57:16 AM
Attachments:

To whom it may concern:

I urge the state to reject the application of Microsoft to approve the Office Open XML standard. This is not an open standard; it is a standard that can only be implemented by Microsoft, as it contains a great deal of legacy code and unexplicable, nonsensical notations and formats. In short, this is nothing but a transliteration of existing Microsoft formats, and cannot be fully and faithfully implemented by other software. And this is Microsoft's goal.

What Massachusetts does matters around the world: official recognition garners respect, reduces choice among software vendors, and ultimately imperils our ability to maintain electronic documents over a long period of time. Please help.

Sincerely,
Charles LeDuc
2207-1199 Seymour St
Vancouver, BC V6B1K3 Canada

From: [Trevor Teuscher](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Standards
Date: Friday, July 13, 2007 12:38:24 AM
Attachments:

Hello,

I have been informed that the state of Massachusetts is considering adding Microsoft's OpenXML to its list of accepted standards. Like many others, I consider this a grave mistake. Microsoft's OpenXML is, contrary to its name, not at all an open standard. Including OpenXML as a 'standard' would completely miss the point of having adopted standards in the first place. Having a format that is entirely under the control of an individual company favors that company's format over any other formats. This would be an unfair advantage to a company that has already been convicted as a Monopolist company. Adding OpenXML would only further this behavior.

--

Trevor N. Teuscher
[t.teuscher at gmail.com](mailto:t.teuscher@gmail.com)

From: [Ron Peoples](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Proposed document standards
Date: Friday, July 13, 2007 12:31:35 AM
Attachments:

To whom it may concern,

I'm writing this to weigh in on the subject of allowed "open document standards."

First, I am not a resident of Massachusetts. My concern with your decision is based on two points; other states may follow your lead, and my hope is that you will make the best decisions possible. Yes, I am an idealist.

I am a computer scientist, with over 20 years experience in a number of areas of software development and analysis. I was an OS/2 and Windows NT developer and worked on beta releases of both products. I hope my experience has taught me a few things I can share.

You should steadfastly demand that all document standards you accept be truly "open." If proposed document standards allow for vendor-specific features not available for all vendors, do not accept the proposed standards. Unfortunately, Microsoft's OpenXML standard falls into that category.

Consider the "devil's advocate" view: Can the proposed standard allow a feature that "locks in" a particular vendor? I believe it does. By definition, this is not an open standard.

The OpenDoc standard is completely open. All vendors can build products to support the standard fully. Ask the same of the Microsoft proposal. Can all vendors build products that *completely* support the Microsoft-proposed document? Not if there are "hooks" available to Microsoft only.

I'll keep this short. There's my opinion on the matter.

Thanks for your time,
Ron Peoples

From: [Robert M. McClure](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please adopt open standards for software
Date: Friday, July 13, 2007 12:22:09 AM
Attachments:

From the earliest days of the computer industry, progress was made based on open standards and multi-party cooperation. In my opinion, to continue to make progress all of us should adopt true open standards and avoid the proprietary pitfall.

Microsoft has made claims for the openness of Open XML, but it simply is not true. Please avoid adopting this as an alternative to real open standards.

Sincerely
Robert M. McClure
5363 N Cascabel Rd
Benson, AZ 85602

From: [Max Robson](#)
To: [Standards \(ITD\)](#);
CC:
Subject: I ask the national members of ISO to vote "NO" in the ballot of ISO DIS 29500
Date: Friday, July 13, 2007 12:16:33 AM
Attachments:

Hi,

I ask the national members of ISO to vote "NO" in the ballot of ISO DIS 29500 (Office OpenXML or OOXML format) for these reasons:

1. There is already a standard ISO26300 named Open Document Format (ODF): a dual standard adds costs, uncertainty and confusion to industry, government and citizens;
2. There is no provable implementation of the OOXML specification: Microsoft Office 2007 produces a special version of OOXML, not a file format which complies with the OOXML specification;
3. There is missing information from the specification document, for example how to do a autoSpaceLikeWord95 or useWord97LineBreakRules;
4. More than 10% of the examples mentioned in the proposed standard do not validate as XML;
5. There is no guarantee that anybody can write a software that fully or partially implements the OOXML specification without being liable to patent damages or patent license fees by Microsoft;
6. This standard proposal conflicts with other ISO standards, such as ISO 8601 (Representation of dates and times), ISO 639 (Codes for the Representation of Names and Languages) or ISO/IEC 10118-3 (cryptographic hash);
7. There is a bug in the spreadsheet file format which forbids to enter any date before the year 1900: such bugs affects the OOXML specification as well as software versions such as Microsoft Excel 2000, XP, 2003 or 2007.

8. This standard proposal has not been created by bringing together the experience and expertise of all interested parties (such as the producers, sellers, buyers, users and regulators), but by Microsoft alone.

Thankyou,
Max.

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From: [Bart Young](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Ecma 376
Date: Friday, July 13, 2007 12:10:56 AM
Attachments:

Dear Sirs/Madams,

Please do not accept the Microsoft OOXML for storage of any documents. ODF is a fully open fully useable standard. It is many times less complex and less expensive to implement. There needs to be only one standard that is open and owned by the people. Anything else will mean that Public Records and Data will be held from the Publics reach.

I have always felt that much of the greatness that got America going started in your fine state. Please continue to lead the fight for liberty and freedom for the People who are America.

Thank You,
for your time.
Bart Young

From: [Uwe Hollerbach](#)
To: [Standards \(ITD\);](#)
CC:
Subject: your proposal to allow MS Office"s OpenXML aka ECMA 376 as an allowed "open standard"
Date: Friday, July 13, 2007 12:01:26 AM
Attachments:

Dear Sirs, please do not allow OpenXML aka ECMA 376 as one of your approved "open standards"; it is no such thing. There are too many areas where it says only "implement this the way we did it in Word 97" (or whatever other specific program might be the case), without also saying how. I am a software developer myself, and if I were given a specification like that, I would no doubt turn pale and start to hyperventilate, or possibly giggle hysterically; it is simply not useful, and that in turn makes this "standard" not useful. The purpose of your earlier requirement of ODF was to begin to use a document format which would be truly open and thus permanently accessible; this will not be the case if you effectively require permanent use of Word 97 and multiple other programs which are available only in binary form. What will we do when our last computer capable of running that or other required programs breaks? No doubt we will cope, and parts of what was stored will still be useful; but there will be a degree of bit-rot, and the point of your earlier requirements was to avoid bit-rot, to have permanent electronic documents.

I am a resident of Massachusetts, and I was very pleased earlier when you rejected the OpenXML pseudo-standard and required ODF instead; it reassured me greatly that my state government was working toward transparent and accessible electronic bureaucracy for the 21st century. I am sorry to say that by again considering OpenXML, you have in my opinion taken a very significant step away from that worthy goal.

sincerely,
Uwe Hollerbach

--

Uwe Hollerbach, Ph.D.

Applied Mathematician

From: [Larry K. Brown](#)
To: [standards at state.ma.us.;](#)
CC:
Subject: Massachusetts and Document Standards
Date: Thursday, July 12, 2007 11:52:04 PM
Attachments:

Dear Sir;

I am a resident of Massachusetts and a software engineer and a member of a international standards body. So I understand the issues here far better than most citizens.

We citizens of Massachusetts should ignore Microsoft's rhetoric and consider the following: As a member of the Foundation Fieldbus Organization I draft parts of their specifications and I represent my companies interest (Invensys Foxboro in Foxboro MA) in doing so. But I meet with our competitors to hash out the fine points of the work. When the draft is complete it goes out to all members for review and comment and even development to prove it's worth. Then the Technical steering committee composed of various companies vote on adopting as part of the standard.

With the ODF specification you have a similar process. Which allows for greater quality of a specification, more competition which will give you lower product prices, and greatly enhanced interoperability.

The Microsoft Office Open XML has none of this. There is absolutely no way anyone other than Microsoft can make a viable product from this specification. They may change it at any time orphaning your previous data.

Massachusetts data belongs to it's citizens. Do not let one and only one company charge us each a access fee to use it.

Larry K. Brown
Principal Software Engineer
Invensys Systems Inc.

33 Commercial St.

Foxboro MA 02035

From: [John Kinney](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Public Comment on ETRM Draft 4.0
Date: Thursday, July 12, 2007 11:47:00 PM
Attachments:

To whom it may concern:

I'm not a citizen of Massachusetts, although I may have a contract job in your state later this year.

I've watched with interest your efforts to adopt a policy that does not hold your state's electronic heritage hostage to the self-interests of a single monopolistic vendor. I applaud the effort! What might our national historic record be like if the Declaration of Independence and other important documents had been drafted in a proprietary "standard" that could only be read/written/modified/distributed through a technology controlled by a single proprietary business entity.

Even in my own small business, the cost of dealing with Microsoft "standards" has been considerable. My clients' reliance on Microsoft software has forced me to purchase the same software in order to provide my consulting services, most of which rely on receiving and transmitting MS formatted documents.

Only recently has Open Office v2.0 freed me from having to spend hundreds of dollars upgrading MS Word, Excel and PowerPoint every few years. Even so, last week, a client sent me an unreadable document in the new Word for Vista format. I took a deep breath and told him I would not do the work unless he could transmit the document in Word .doc or Open Document Text .odt format.

We were eventually able to compromise on converting the information I needed to Adobe electronic paper .pdf format. But that was a problem because his new Vista computer wanted to use the new MS electronic paper "standard", which is nothing less than another effort to lock in its markets to another round of robber baron business practices

These are not theoretical issues. My costs are higher because most of my clients allow themselves to be manipulated by Microsoft's marketing interests.

At any rate, I hope you're successful in resisting Microsoft's efforts to force their proprietary marketing scheme onto your public service agencies. The camel has been gorging itself in the tent for far too long. It's past time to kick it and its nose out of the public services tent forever.

Regards, John Kinney

--

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From: [Sethu Rathinam](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF vs MS-XML as document standards
Date: Thursday, July 12, 2007 11:42:14 PM
Attachments:

Dear Sir/Ma'am-

I wrote a long time ago supporting the adoption of ODF as an open format for documents. Now that Microsoft's XML (the so called OOXML) is being considered on equal footing, I oppose that OOXML being a standard - because it does not meet the definition of OPEN that the MA ITD has defined. Microsoft can change the "binary token" anytime and maintains full control of the specification. How can you call it "open" in any way? Have you been keeping track of its non-compliance with the US DOJ judgment and the similar issues in Europe for which it has been fined hundreds of millions of dollars? If you truly want your data to be readable in 50-100 years, choose a truly open specification like ODF and not the pretend-to-be-open specification like the OOXML. I wrote to the then Governor Mitt Romney and received a letter saying that ODF will be kept as standard (at that time, no discussion on OOXML was happening). The spirit of that decision should be maintained.

Thank you.

Best regards,

Sethu R Rathinam
1515 Greens Way Ct NE
Cedar Rapids, IA 52402

From: [Kirby Files](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ETRM 4.0 Concerns
Date: Thursday, July 12, 2007 11:35:35 PM
Attachments:

As a Massachusetts citizen who must interact with the state government using the electronic document standards chosen by the state, I am concerned about the surprising recent decision to add Ecma-376 (Microsoft Office Open XML) to the list of recommended Enterprise Standards. I also question the published decision criteria for doing so ("Decision Process for Recommending a Standard as an Enterprise Standard" in the Introduction to ETRM v4.0).

I use only Linux operating systems and web-based applications in my household, and am especially sensitive to the importance of interoperable open standards for all documents. For me, this means the Open Document Format (ODF), JPEG, Scalable Vector Graphics (SVG), and the Portable Document Format (PDF). All of my documents and media saved in these formats can be edited or viewed in a variety of applications on both my chosen operating system and any other operating system. For ODF, I can use OpenOffice.org, KOffice, Google Docs, and more.

However, if the State of MA chooses to use MS Office Open XML to send important state documents and forms to me, I will not have a single application available to me to edit or even read them (Microsoft does not even release a viewer for Office Open XML documents for the Linux OS).

Even if the State of MA doesn't require citizens to use Office Open XML to interact with the government, storing critical state documents in this format jeopardizes the preservation of these documents for posterity. The Office Open XML format has neither "existing or growing industry support," nor does it "interoperate with other relevant Enterprise Standards" -- failing to meet two of the critical criteria for deciding to recommend a standard. Without alternative application

implementations, the ability to open these documents exists solely at the discretion of Microsoft.

Looking at the other prominent office applications, none of the following support Office Open XML natively: Star Office, OpenOffice.org, Google Docs, Corel WordPerfect. Neither Microsoft's limited-functionality import/export filter to ODF, nor Sun's ODF translator help a user of any application other than Microsoft Office to open a file saved as Office Open XML.

Taken together, this lack of alternative application support or interoperability mean that the state will be reliant on Microsoft as the sole supplier of software to read or edit Office Open XML documents. In fact, the way I read the Ecma-376 specification, that must always be true. The specification makes it impossible for other implementors to write conforming applications, as it leaves key presentation details undefined (by referencing previous Microsoft Office product behavior, rather than specifying the desired behavior).

I would be disappointed to see such a specification, which on the face of it appears to fail to meet the stated decision criteria (except by allowing the loophole, "are there compelling business reasons to recommend adoption?"), chosen as an alternative to an open and interoperable standard like ODF. I wouldn't like my taxes to be spent producing documents that may be unreadable in the future, and that I will not be able to read with my chosen software.

Sincerely,
Kirby Files
6 Allerton Rd
Milton MA, 02186

From: [RiverSong](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Regarding MA approval of OOXML as a viable standard
Date: Thursday, July 12, 2007 11:33:27 PM
Attachments:

I am not a Massachusetts resident, but I am interested in how your decision on OOXML may effect other states.

I am an IT specialist providing support for a Kentucky educational district. I also do training and support for a large local user group. I've been involved in education, teaching Electrical Engineering as well as providing technology improvements to others in the teaching field for the last 17 years.

I am concerned that OOXML is being considered for approval and acceptance as a "finished" and "open" standard. I oppose that approval.

My reasons are varied, but can be condensed to two salient points.

1. OOXML is premature. It is being rushed through approval processes, pushed more by a single vendor's lobbying efforts, than a need or demand by the consumers or industry. The work on OOXML has been rushed, other outside parties have been prevented from fully reviewing, commenting or adding to the standard. What exists on paper now, is incomplete, and would take a working committee several years to reconcile and complete. As is, it is an ad hoc implementation to a single vendor's product, not an open standard others could use, implement or extend.

I think if OOXML is fully vetted and opened to 3rd party review, it might be reconsidered as an open standard 2-3-4 years down the road.

Currently it is a massive, 6000+ page cut and paste job, that often obfuscates the very function it is supposed to explicate. The very immaturity suggests that it will undergo major revisions before it becomes usable by others and acceptable to the user community at large.

2. ODF is a standard that has been reviewed, refined and reconciled with other,

existing, well accepted standards. It **IS currently** capable of representing most existing documents, and is actively being extended by a community of developers and vendors. Microsoft has DECLINED to participate in extending the ODF specifications to provide backward support.

Any support for earlier MS products has been done by reverse engineering, and has achieved a fair level of functional compliance. In some cases, ODF standards provide better backward compatibility for older MS Office, WordPerfect and SmartSuite than do the the current Office 2003 suite.

It makes far more sense for Microsoft to join the existing ODF work group and actively document the older formats, merging their work into ODF.

If Microsoft feels that ODF is incapable of supporting special features, it is more appropriate for OOXML to incorporate ODF, SGML, PDF and other established standards as a sub-set, and then extend OOXML with the special features unique to it.

That would shrink the size of the OOXML document and make it clear what portions have been time-proven and accepted, and what might be newly evolving. It also guarantees a higher level of interoperability, if already proven formats, functions and documentation is re-used, rather than re-writing the entire universe of format definitions from scratch.

Just my opinion, but you'll see that many serious and concerned technologist voice the same viewpoint.

Thanks,

Tom Scanlan,
MEng EE, USA Ret., KIPCUG SIG Leader, Owner, RiverSong Technology
Taylorsville, KY 40071

From: [Ed Landaveri](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Ecma 376
Date: Thursday, July 12, 2007 11:17:18 PM
Attachments:

Dear Gentlemen and ladies,

The present is to present my respects and humbly ask you a question, why to place the Microsoft Open? XML format as being considerate for official States documents? Open?? XML as I put with ?? because of Openess have nothing otherwise it wouldn't need translators to interoperate with other standards like the real Open Document Format. Please do not bend to lobbyists and the pressure of this company when you could save billions of dollars for you constituents. Besides that if Open XML would be open then it's licensing wouldn't limit it to its parent company. Microsoft have all the 50 states grabbed by the neck it's time for you to stand up and liberate Massachusets and the whole America from its tyranny. The ODF which you aproved before is supported by multiple platforms and would guarantee that in the future you don't have to spend the money for upgrades and be secure that your documens will safely be retrieved at any time on any time of platform. Please remember the rest of America and the whole world is looking at you with hope to reject Ecma 376 as another "open standard" and to break the bonds that tie us to this monopoly. Thanks

Sincerely,

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From: [Pandu Rao](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Re MA ODF Policy
Date: Thursday, July 12, 2007 11:12:32 PM
Attachments:

Hello,

I understand the state of MA is looking at allowing Microsoft's OOXML as an alternative document format (in addition to ODF).

Please reconsider this decision.

Multiple standards introduce confusion and benefit vendors at the expense of consumers.

Vendor controlled formats (such as OOXML) are used to lock consumers in. The state of MA adopting ODF as the official document format frightens Microsoft more than the anti-trust trial by the US Justice Department. This is because open formats and specifications really level the playing field at a technical layer. This is far more effective anti-monopoly mechanism than any legal remedy or consent decree.

The ODF format is a technically sound specification that can be implemented by any vendor (including Microsoft). The reason they chose not to fully support a simple specification is particularly telling. It really levels the playing field both in favor of the average consumer and independent software vendors.

The United States has a long history of establishing standards which help consumers and vendors in the long run. But the vendors have to be firmly guided towards it.

All things considered, the state of MA mandating ODF as the only official document format will ensure the following:

1. Data longevity (data will be accessible indefinitely)
2. Virtually zero vendor-risk (as the files can be parsed by any

vendor's ODF reading software)

3. Enable users of alternate operating systems and office application suites to use MA-specific documents
4. Competition amongst software vendors making for a healthy marketplace.

Thank you for your time.

Best regards,
Pandu Rao

Computer Programmer/Manager

From: [Frank Kelbe](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Microsoft's non-open XML "standard"
Date: Thursday, July 12, 2007 10:59:47 PM
Attachments:

I work for one of the largest corporations in America. Just yesterday, several of us were attempting to collaborate on a proposal response. One of the teammates had installed Microsoft Office 2007 on his system (contrary to corporate guidance), and had sent out a document in the Office 2007 format. Although everyone else on the team had a patch automatically installed (by corporate) that allowed their Office 2003 to read and write Office 2007 formats, no one on the team could read the document.

What do you think the chance is of you properly reading your Office 2007 documents with Office 2015 or Office 2046?

Just a short story to illustrate the problems with using proprietary formats. Microsoft's XML format certainly maintains it's proprietary heritage if the published specification is not simple, open and free from all encumbrances.

Frank Kelbe

From: [seandc at att.net](mailto:seandc@att.net)
To: [Standards \(ITD\)](#);
CC: [seandc at att.net](mailto:seandc@att.net);
Subject: OpenXML
Date: Thursday, July 12, 2007 10:41:19 PM
Attachments:

To: Standards, State of Massachusetts

Please do not adopt the proposed ECMA standard OpenXML as co-equal with the ISO ODF standard. They are not equally open. In particular, OpenXML has a number of problems which will only get worse with time:

- OpenXML is based on the well documented idiosyncracies of a single vendor's software. These have been discussed widely and include faulty date handling, sloppy spreadsheet formula definitions, and proprietary binary content.
- It is highly unlikely that any other reputable software vendor will be willing (or able) to produce software which reproduces the idiosyncracies of the OpenXML specification.
- I'd go so far as to predict that even Microsoft's next version of the Microsoft Office Suite will not be a completely reliable implementation of their own 6000 page specification.

By comparison ODF:

- Was not made to serve a particular vendor's requirements.
- Has been the subject of extended peer review and improvement.
- Has no proprietary components.
- Has multiple current implementations.

In the light of these comparisons, it's clear to me that ODF has a much better chance than OpenXML of preserving today's documents well into the future without the need for regular "format conversions". The future cost burden of OpenXML, together with the risk associated with OpenXML that in the future OpenXML documents will be partly or completely un-readable, make the adoption of OpenXML a significantly riskier choice than simply standardizing on ODF.

Yours sincerely,

Sean Doull-Connolly
17509 Calverton Road
Huntersville, NC

From: [Don Smith](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please do not allow Ecma 376 to be an acceptable standard.
Date: Thursday, July 12, 2007 10:37:17 PM
Attachments:

Hello,

If a standard is proposed, and controlled by a single vendor, it ceases to be a standard. If a single vendor is responsible for the official implementation of a standard it ceases to be a standard. ECMA 376 is a single sourced standard (If you want to see what this means in reality check what happened with sun and nfs). The purpose of selecting an open standard (A truly open standard) is that being fully specified it allows other parties to provide tools, thus fostering competition, or providing features that the original vendor does not. By choosing a standard specified by microsoft, with only 1 reference implementation, namely microsoft's, all other implementations will be seen as inferior if microsoft does not follow their own spec. Please, if you care about the data that the government produces being readable in 10 years, do not allow microsoft to be the sole arbiter of what is a compliant document. They have a history and policy of "Embracing and extending" their own standards. If the government produces the data, it belongs to the people, why force people to spend hundreds of dollars to read data that they rightly own.

I apologize if my comments seem zealous or unorganized, however they come from over 10 years of experience in the IT field.

Thank you,
Don Smith

From: [Derek Fox](#)
To: [Standards \(ITD\)](#);
CC:
Subject: The Non-Openness of OpenXML
Date: Thursday, July 12, 2007 10:34:12 PM
Attachments:

Dear Standards,

I write to register my dissatisfaction with Microsoft Corporation's OpenXML standard - since it is neither truly open, nor truly a standard, it does not deserve a place in any committed effort to open Commonwealth records and communications to public access and reliable and permanent archiving.

First, note that OpenXML is not truly open. Obviously, any standard encumbered by patent rights will not be freely accessible and implementable by third parties; yet Microsoft refuses to state categorically that /working implementations/ of OpenXML will be free of patent infringement. Perhaps more simply, how is any third party expected to implement, in real software, unspecified functions such as "autoSpaceLikeWord95"? The OpenXML specification consists of more than 6,000 pages of undocumented calls such as this.

Second, note that OpenXML is not truly a standard. Microsoft's maneuverings through international standards bodies notwithstanding, a standard cannot be worthy of the name until at least one party, other than the original author, has managed to cobble together a (tested, working, patent-rights free) implementation.

I humbly suggest that the Commonwealth "stick to its guns" with respect to the qualities it wishes to require of its common document formats, and not compromise on the principle of open access to Commonwealth documents, not even one bit, not even for the most powerful software corporation on the planet.

Sincerely,
Derek Fox

From: [Richard Gonsuron](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF format support
Date: Thursday, July 12, 2007 10:33:23 PM
Attachments:

To whom it may concern,

As a professional in providing highly specialized applications to the Oil And Gas industry I feel that I must express my concerns about this issue. We recently encountered problems with our product's compatibility with the latest release of the most widely used operating system in use on today's computers. We have realized that all of our efforts to make our software compatible with the previously offered OS was in vain and we have spent the last 3 months making our software compatible with their latest version of their popular OS. All costs of these changes where solely due to the fact that we where forced into cooperation and has depreciated our profit margin. WE LOST MONEY on this deal and there is nothing we can do about it... period.

Vendor lock-in is a very serious issue for us. Being forced into investing a massive amount of resources to make these "required modifications" simply because this is the OS that everyone uses is critical. The trickle-down effect of this means higher gas prices at the pump. It's simple economics and is something that we, as a nation, should not have to endure.

This has nothing to do directly with the ODF v.s. Open XML debate but it does introduce the seriousness of having one singular company control and demand that we conform or else be eliminated.

We don't necessarily deal with document standards directly but other aspects of this issue scares us immensely. Today it's Vi!#\$\$. What will we have to face tomorrow? We make money developing software for today's modern computers but this is a moving target lately. What will happen in 100 years from now with all of those critical government documents that absolutely have to be recalled? You REALLY need to think about this... seriously!

I cannot reveal who I work for and I am sending this using my own personal email

account for fear of retaliation. Please accept my sincere concern of this issue.

RG

From: [Jeffrey Kuligowski](#)
To: [Standards \(ITD\)](#);
CC: [Jeffrey Kuligowski](#);
Subject: Open XML and Translators
Date: Thursday, July 12, 2007 10:33:22 PM
Attachments:

Xandros, Inc. is the leading provider of award-winning, intuitive, end-to-end Linux solutions, including desktops, SMB and enterprise servers, and mixed-environment, cross-platform management tools. We are headquartered in New York with research and development facilities in Ottawa and Mumbai, and sales and support offices worldwide. The topic of file formats is one that we have an interest in as evidenced by our recent announcement to participate in the open source project on sourceforge that is developing an ODF-Open XML translator for text, spreadsheet and presentation documents.

Our customers, including public sector customers, have told us they are interested in using products which support multiple file formats, including both Open Document Format and Ecma 376 – Office Open XML File Formats (“Open XML”), and as a software provider we are interested in meeting this customer need. As a result, we are both participating in the translator project and we have also announced that we will be shipping support for Open XML in upcoming versions of OpenOffice.org in our product line.

We believe strongly that competing office productivity applications should make it easy for customers to exchange files with one another and allow them to use their operating system and office productivity applications of their choice. The translator project we are participating in enables this exchange and promotes competition between office productivity applications.

We also support the Commonwealth’s desire to promote “open standards”. In our view, there are many standards bodies that can create “open standards”, including both Ecma International and Oasis. The specification for Open XML is freely available to anyone and we are using it in both our work on the translator project and in supporting Open XML in our products.

In short, we are pleased with the Commonwealth’s approach to “open standards” and support the Commonwealth’s proposal to add Open XML to its ETRM. We see customer demand for both Open XML and ODF, and we favor providing all

customers, including the government agencies of the Commonwealth, the choice to pick the file format and the productivity application that is right for them. We also believe the existence of interoperability between the two file formats is key, and that interoperability exists today (as evidenced by the translator) and will continue to evolve in the future.

Regards

Jeff Kuligowski
Senior Vice President of Sales & Marketing
Xandros, Inc

From: [Philip Cameron](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Microsoft's OfficeOpen XML specification (now Ecma 376)
Date: Thursday, July 12, 2007 10:28:17 PM
Attachments:

Dear Sir,

I have read on the web that you are looking for comments concerning the addition of Microsoft's OpenOffice XML specification to the list of acceptable specifications.

I feel that embracing OpenOffice XML would be a serious mistake for the commonwealth. It is a serious mistake to embrace two standards for office documents. It doubles the archiving costs and increases confusion and increases difficulty in conducting business.

- 1) Looking down the years, when today's software is a historical note, we will still be faced with a huge collection of Office files that will still be interesting to review from time to time. When we are faced with writing software to ODF and the proposed Microsoft standard, which will be the better starting point.
- 2) Microsoft is abusing the time honored international process of vetting and approving standards. They are not permitting the serious deliberations that a standard deserves and they are not considering the offered comments. Essentially, what they have proposed is pretty much what will be accepted. This abuse is destined to yield a standard that is seriously flawed, a standard that without Microsoft's backing would have already been abandoned or rejected. This standard is a weak document on which to base the commonwealth's archives. There is a better option, ODF, and we should adopt it.
- 3) Some of the reasons for rejecting ODF including accessibility concerns are NOT addressed in OpenOffice XML. Disabled citizens would do much better with ODF based technology.
- 4) Microsoft can, if it chooses, adopt ODF. There is nothing stopping

it. Microsoft has been invited to participate in the development of the ODF standard and they have declined. ODF is a free open and not patent encumbered specification with a lot of freely available sample and product code. The same cannot be said of OpenOffice XML.

4) One of the goals of the commonwealth should be to encourage competition and innovation in IT. ODF is supported by many software vendors both proprietary and Open Source. Major corporations including IBM and Sun are well positioned to support the commonwealths document needs. In addition there are a number of smaller companies that provide innovative solutions based on ODF. The saved files will be useful in many software packages. Accepting the Microsoft proposed standard would limit the commonwealth to a single vendor. For decades now Massachusetts has been a center of software development. Lets encourage more software companies by embracing ODF.

5) Cost. The commonwealth has very little bargaining strength with a sole vendor of key technology. You can complain, threated, throw a tantrum, then pay what is demanded. That is not the case when there are several vendors that are competing for the commonwealth's business.

6) From a business perspective you are in a very weak position when dealing with Microsoft. Just look at the influence that has already been exerted in this matter. What kind of vendor relationship does the commonwealth expect to acheive? Actually, come to think of it, why does the commonwealth embrace Microsoft at all?

As a life long citizen of Massachusetts. I grew up in the 50's in Attleboro. I have finally been moved to write to my government. I really believe that this matter is of grave concern to future generations. Just as we like to read the founding papers and other old documents from colonial times, so will future generations want to read about this generation and this adminisration. Please give them a chance.

Sincerely,
Philip Cameron
2 Fletcher St.
Winchester MA 01890

From: [Matt Hudson](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Microsoft OO XML specification is bad for America!
Date: Thursday, July 12, 2007 10:24:34 PM
Attachments:

Between the technical failures of Microsoft's proposed standard and Microsoft's abominable track record, I think this is a bad move for your state and a bad move for the country. Microsoft cannot be trusted. History has shown time and time again that they have no respect for their customers and arrogate themselves in the comfort of their desktop software monopoly.

Don't do it.

Matt Hudson
Software Engineer

From: [Zaine Ridling](#)
To: [Standards \(ITD\);](#)
CC:
Subject: In support of ODF, and against MS-OOXML
Date: Thursday, July 12, 2007 10:24:27 PM
Attachments:

Dear Ms. Pepoli,

I'm writing to ask your sole support for ODF over MS-OOXML for all the reasons I'm sure you're aware of.

However, as an archivist for the past 27 years, I can only say that millions have been spent converting both hardware and software formats over that time. For the past decade, I've backed up every possible file I could via mere text format, since Microsoft's own .doc and .xls formats changed seven times over the past ten years. Each time Microsoft changed them, I had to go back and re-archive everything in that format to keep that data accessible, and each time, that took more money, more time for budget requests, and more staff.

ODF offers a way out of my 27-year nightmare as an archivist. Its XML format is simple, straightforward, and based on existing W3C standards already in use and ISO certified around the globe. I'm not anti-Microsoft, but as has been recently proven, MS-OOXML is deeply flawed:

<http://www.robweir.com/blog/2007/07/formula-for-failure.html>

and will end up costing the commonwealth money that could be better spent elsewhere in the budget (raises, pensions, healthcare, new equipment, you name it). I urge you to reconsider adding MS-OOXML to Massachusetts' approved formats. At best, MS-OOXML is a "product specification," not a standard by any measure, and certainly not a de facto one.

Thank you.

- Zaine Ridling, PhD
CEO, Access Foundation

<http://www.anova.org/access/>

From: [Andy Spitzer](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Public Comment on ETRM Draft 4.0
Date: Thursday, July 12, 2007 10:20:35 PM
Attachments:

To Information Technology Division, Commonwealth of Massachusetts.

Please refuse to include ECMA 376 on the approved list of Open standards. As you are no doubt by now aware, this ECMA standard is unable to be completely implemented by anyone other than Microsoft, or those who have signed non-disclosure agreements with Microsoft. This is NOT an Open standard, and the Commonwealth will be poorly served by it.

Please allow only truly Open standards on the list. Do not let Microsoft hold our public information hostage to their private profits.

Thank you,

Andy Spitzer
North Andover, MA
iwoof at yahoo.com

It's here! Your new message!
Get new email alerts with the free Yahoo! Toolbar.
<http://tools.search.yahoo.com/toolbar/features/mail/>

From: [Ron House](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Your proposed damage to open document standards
Date: Thursday, July 12, 2007 10:09:43 PM
Attachments:

Dear Sirs and Madams,

I am writing from Toowoomba, Australia, about your new proposals to water down your standards for an open document format. The reason I write despite not being in your great state is that, as the standard leader, your accomplishments over the past several years will influence governments all over the world, including all your friends here in Australia.

You have come under tremendous commercially-motivated pressure, I am aware, to loosen your requirements so as to permit the acceptance of the proprietary Microsoft OOXML format in addition to the excellent ODF international standard.

You should be aware that Microsoft has been caught out in the past 'astroturfing'; that is, paying supposed constituents and others to make it appear as if there is some sort of community support for their position. There is not.

OOXML is a broken format that legislates, amongst many similar other things, such absurdities as reporting the wrong day of the week for days in the year 1900, and mathematically wrongly defining the ceiling function in spreadsheets. (Errors such as the latter can cause mistakes leading to monetary and property damage, and even loss of life. Surely it would be a mistake to expose your Commonwealth to such risks, purely on the basis of a fabricated 'call' from your citizens?)

At the absolute most, if you feel you must, you could consider accepting OOXML as a "legacy compatibility format" - but certainly not as a forward-moving standard for documents created from this time onwards.

I thank you for your efforts in leading the world in achieving document

standards.

--

Ron House house at usq.edu.au

<http://www.sci.usq.edu.au/staff/house>

Ethics website: <http://www.sci.usq.edu.au/staff/house/goodness>

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From: [John H. McCoy](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF
Date: Thursday, July 12, 2007 10:09:38 PM
Attachments:

I hope you will do us all a favor and stick with the ODF requirement until such time as Microsoft makes a usable converter available. I've tried the one from Sun (word-->ODF-->word) and for my Word documents it doesn't even come close.

Thanks.

--john

From: [Tom Poe](#)
To: [Standards \(ITD\);](#)
CC: [PJ at groklaw.com;](#)
Subject: small towns, tv, radio, and openxml conflicts
Date: Thursday, July 12, 2007 10:02:42 PM
Attachments:

I live in Charles City, Iowa, a small town in north-central Iowa, with a population of something less than 8,000. There have been no vendor wireless infrastructure proposals that are even remotely affordable for rural communities. A community-based wireless mesh network based on Meraki units (originally from the Massachusetts Institute of Technology), are available for \$50 (one-time fee) per house. An OC-3 cable to the center of town will provide access at a price of \$3 per house per month. This wireless mesh network solution acts as a last mile solution for our 1600 kids in grades K-12 to access the state's fibre optic network, and give our community access speeds of approximately 45Mbps. There's one other topic you need to know about.

In April of this year, the state enacted a law that takes control of community franchise contracts. This law entitles every community in Iowa with a population of 50,000 or less, to two (2) public access channels. On February 9, 2009, cutover from analog tv to digital tv will occur. Technology exists that indicates each analog tv channel will translate into, or up to, eight (8) digital channels. In the state of Iowa, it is possible, that on February 10, 2009, some tens of thousands of digital public access channels will "hit the air". Simultaneously, these digital tv shows will be added to the world's major repositories for distribution to a myriad of syndicated Internet TV broadcasters.

If one recognizes that a digital tv show can be produced, edited, formatted, and broadcast for little more than the cost of a cheap desktop computer, sitting on someone's kitchen table, and Iowa is just one of 50 states in our country, we immediately realize the significance of February 10, 2009. :)

I now present an argument in favor of rejecting any proprietary

"standard". Our world will hear the explosion of digital tv and radio on February 10, 2009. What will be critical to every small, rural community in America, is the reliance of "tagging" their digital files with information that is formatted on a worldwide standard. If not, these digital files will be subject to a restricted worldwide audience. You can also apply every argument others have submitted to this request that you not permit a proprietary approach to interfere with the tremendous opportunity that presents itself to each and every one of your state's small, rural, large, cities and towns. Run the numbers, and you'll have your state's impact measured in absolute terms. You owe it to your state to give all your citizens the opportunities afforded by the template presented above in the arena of public tv and radio and the digital age.

Tom Poe

1315 Cleveland Avenue

Charles City, Iowa 50616

Ph: 641-228-3271

eMail: [tompoe at fngi.net](mailto:tompoe@fngi.net)

From: [John Dillman](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Proposal to re Microsoft's OfficeOpen XML specification
Date: Thursday, July 12, 2007 9:45:55 PM
Attachments:

Proposal to oernut Microsoft's OfficeOpen XML specification to qualify as an addition to the Massachusetts list of usable "open standards".

1. Government should not be permitting any particular proprietary format to qualify for use as usable for state government purposes unless they are prepared to permit all formats to be used for such purposes.
2. MS will obsolete and render the format unusable as soon as they see that it is in their interest to do so. Massachusetts will regret this decision unless they are now resolved to pay for the conversion of MS formatted documents to the new MS format. Of course government does not ultimately pay for this, its tax payers do. There will be enough of them around to figure out who is responsible for this proposal being adopted despite the public interest.

From: [Healy, Stephen S, Military](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OfficeOpen XML specification (ECMA 376)...
Date: Thursday, July 12, 2007 9:08:27 PM
Attachments:

To whom it may concern,

The OfficeOpen XML specification is not a usable standard by any definition. It is over 6000 pages long, and some tags refer to the proprietary and undocumented Microsoft formats and behaviours, like "autoSpaceLikeWord95" or "useWord97LineBreakRules". Use of these tags may cause documents to render incorrectly (or not render at all) in non-Microsoft or non-Microsoft licensed software, or software used many years in the future, which may be an issue for cross vendor interoperability, interchange of data, and archiving. Not to mention that MS XML re-invents the wheel (date format incompatible with ISO 8601, language specification incompatible with ISO 639).

This is completely unacceptable in a standard. The size of the specification is borderline obscene to impliment, its using proprietary behaviors in its specification, and conflicts with other ISO standards. JUST SAY NO.

Respectfully,

Steve Healy
Seekonk, MA

From: [eaglebeak at pvns.net](mailto:eaglebeak@pvns.net)
To: [Standards \(ITD\)](#);
CC:
Subject: open format consideration
Date: Thursday, July 12, 2007 8:52:39 PM
Attachments:

sir/madame,

It has come to my attention that your organization is in the process of deciding on proposed file formats of state documents and that Microsoft's supposed open XML is being considered.

I have been observing Microsoft's MO since the early 1980s. As a single individual, expressing only my personal views, it is my humble opinion that the aforementioned company should not, under any circumstances be allowed to be in control of any document format in which official documents are stored. If past performance is any indicator of the future then their 'standard' will be ill defined at release and will not be adhered to in future revisions of the office package.

If there has ever been a time to ignore lobbyists, now is the time. I believe that you are charged with an extremely important historical decision. I encourage each and every one of you to view your impending decision in that perspective.

Thank you for your time,
E. Douglas Jones (BSEE)

This message was sent using IMP, the Internet Messaging Program.

From: [John R Pretz](#)
To: [Standards \(ITD\);](#)
CC:
Subject: MS XML document format
Date: Thursday, July 12, 2007 8:49:51 PM
Attachments:

Hi,

I am not a citizen of your fine state, but I've been monitoring your pioneering work on requiring open standards for electronic storage. I think Massachusetts should be praised for insisting on open document formats for government business. I hope all states (and the federal government) follow suit.

I think, however, you should refrain from including the Microsoft XML document format in your list of acceptable formats. There has been much discussion about the deficiencies of the Microsoft XML format. For example, there is nice coverage of deficiencies in the OOXML 'standard' for formulas:

<http://www.robweir.com/blog/2007/07/formula-for-failure.html>

And if you favor something comprehensive, there is a nice summary of problems with OOXML maintained by 'grokdoc'

http://www.grokdoc.net/index.php/EOOXML_objections

I would encourage you to stand firm in your convictions. Please do not let Microsoft's special interesting in maintaining its monopoly alter your stance. There is already an approved standard for documents (the open document format).

Regards,

John Pretz

From: [Terry Braun](#)
To: [Standards \(ITD\);](#)
CC:
Subject: opposed to microsoft "standard" Ecma 376
Date: Thursday, July 12, 2007 8:16:16 PM
Attachments:

I am opposed to addition of Ecma 376 to the list of open standards. Ecma 76 is an attempt to create the appearance of openness while maintaining a proprietary standard. This is harmful to the state and to the development of interoperability.

Sincerely,
Terry Braun

From: [Jim Gettys](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ODF vs. OOXML.
Date: Thursday, July 12, 2007 8:15:30 PM
Attachments:

Documents we produce will be read years, decades, and centuries from now. Our government has a duty to protect the citizen's information and have it available in a format that will stand the test of time. Our government has a fiduciary responsibility to preserve the information.

At this point, I still reference materials I made in 1983 routinely, but use radically different tools than I did then; in fact, many of the tools I used then are no longer available to me (though some are). The documents stored in formats that are not readable in text form are now, in effect, lost to me. This information predates Microsoft office, or, for that matter, ODF tools.

For electronic documents to have this archival value, they must be stored in a form that anyone can write programs to manipulate the data. There cannot be restrictions as to whom may implement such programs, for any purpose, at any time. And by preserving the idiosyncrasies of Microsoft Office into OOXML, the ability to access this information is almost impossible for other tools to succeed, thereby locking away this information, and requiring "rent" to be paid to a single corporation for public information.

We must have a format that is sane to build on for the long term, where the long term is measured in decades. OOXML cannot be implemented by others; this means that information that I paid for as a Massachusetts tax payer is held hostage to a single company.

For these, and all the objections outlined in:
http://www.grokdoc.net/index.php/EOOXML_objections
and others, I urge Massachusetts to unlock our future.

Jim Gettys
21 Oak Knoll Road

Carlisle, MA 01741

--

Jim Gettys

One Laptop Per Child

From: [FPirrone at tona.wnyric.org](mailto:FPirrone@tona.wnyric.org)
To: [Standards \(ITD\)](#);
CC:
Subject: open documents standards
Date: Thursday, July 12, 2007 8:15:24 PM
Attachments:

Briefly, the public's trust cannot be served by preserving records and other data in formats designed, controlled, and vulnerable to the whims of proprietary software vendors. The situation was totally different when everyone had the means to "understand" historical documents - all the way through microfilm/fiche. One could always hold this medium up to a light and peer through a magnifier, even if the material medium only fit one manufacturer's machine.

Microsoft, through circumstance, design, and monopolistic manipulation of its markets, has a consistent history, often captured in the phrase "embrace and extend" whereby any attempts at establishing standards, the existence of which threaten monopolistic control and vendor lock-in, have been thwarted by the initial "embrace" of the standard, one clear example of which is HTML, and the inevitable "extention" of that standard with proprietary inclusions.

Only Microsoft's Internet Explorer is able to correctly render Web sites, which may be as crucial as FEMA's portal for hurricane Katrina victims along the Gulf Coast, or as trivial as someone's private site. Entire segments of the population and even the world may be excluded by this practice.

The ODF was fairly developed with input welcomed from all. It is totally open and democratic. It will always be reconstructable even if all current participants are no longer present and if technology has changed beyond what we would recognize. By definition, that is not the case with the deceptively named OpenXML.

At one point in the recent past, Massachusetts stood as a beacon for the rights of the people and responsible government's acknowledgment and preservation of those rights. An opportunity still exists for this blow to be struck against forces of stasis and forces of unwelcome change currently arrayed against the public good.

Frank

"Life is not a spectator sport." - Jackie Robinson

Frank Pirrone
Technology Integrator
Tonawanda City School District
(716) 694-7660, ex2002

From: [Tom Field](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Office XML
Date: Thursday, July 12, 2007 8:10:14 PM
Attachments:

I am writing to request that you reject the Microsoft's OfficeOpen XML specification due to technical deficiencies and poor performance on Microsoft's part in participating in standards around the world.

Thank you.

From: [Don Lindsay](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Comment on Adoption of OOXML as a Document Standard
Date: Thursday, July 12, 2007 8:09:04 PM
Attachments:

Dear Sirs:

As an elderly computer scientist, I have seen the whole span of the growth of the Internet. And I assert that the Internet has flowered because of good technical standards that allowed easy interoperability.

My analysis of OOXML is that it is not a good standard, in the meaningful sense that it can't be used for several important practical purposes. It fails to define numerous things, to the point where it is not possible to determine (from the standard) if many existing documents meet the standard. For the same reasons, it is not possible for a third party (such as a future archivist) to construct a program which reliably reads supposedly-compliant documents.

To give a specific example, it is my understanding that OOXML-compliant files can contain embedded binaries generated by MicroSoft Office tools, and no specification is given as to what those binaries might mean.

It seems that adopting OOXML is incompatible with the major and legitimate goals of a standards process.

I therefore recommend that OOXML not be adopted in its present state.

Sincerely,

Donald C. Lindsay, Ph.D.

From: [EXI-Holt, Paul](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ECMA 376 does not qualify as an open standard
Date: Thursday, July 12, 2007 7:58:37 PM
Attachments:

Gentlemen,

An open standard must clearly define its terms. The proposed standard must define the purpose and behaviour of every component of a document in terms of composition, rendering and storage without reference to the embodiment of that behaviour in a single vendor's product.

I am most concerned with sections 2.15.3.6 autoSpaceLikeWord95. The specification contains no information about how "Word95" spacing actually works, nor is this information available anywhere else, even, apparently, to the writers of the specification. autoSpaceLikeWord95 can only be fully implemented by the vendor of the emulated product, unless the standard specifically describes that behaviour.

The stated aim of the standard is document preservation. The document must be able to survive the loss of Word95, or any other specific document reader embodied in software. The document, plus the specification defining its format, must be sufficient to preserve the rendering and compositional behaviour of the document. If it were otherwise, the stated benefit of the standard would be lost.

--

Paul Holt
Senior Consultant for Renewtek, contracted to The Boeing Company.
p +613 9647 3135
m +614 3383 6540

-----BEGIN GEEK CODE BLOCK-----

GIT/AT\$ d-@ s+:>+: a C++\$ UL+++\$ U+ !UC\$ P+ L++\$ E--- W+++\$ N+ o+ K? w
\$ O? M+ V- PS+(++) PE-(--) Y+ PGP+@ !t !5 X R+ tv- b++ DI+ D++ G e(++
h----- r+++ z++++

-----END GEEK CODE BLOCK-----

From: [ginny](#)
To: [Standards \(ITD\)](#);
CC:
Subject: MS vs ODF
Date: Thursday, July 12, 2007 7:56:49 PM
Attachments:

I think the first question to be answered is what are we trying to accomplish? Are we trying to establish a document format that will insure our children's children will be able to read our documents? If that is the goal, simply looking at the size of the specifications should provide an indication of the likelihood of success. Assume, for a moment, that MS and ODF share this goal. The bigger the spec the bigger the likelihood of incompatible implementations. The smaller the spec the more likely the compliance. That alone should give the vote to ODF.

If the goal is to preserve the existing formats, perfect compliance is not possible. Even MS has not accomplished that from one generation of MS Office to the next. On the other hand, if simply being able to read the legacy documents is sufficient, one implementation of ODF (OpenOffice), already does that fairly well. It is capable to translating MS legacy documents into ODF format and back with only minor difficulties, permitting a fairly painless transition (for everyone except maybe MS) from legacy formats to truly open formats.

Secondly, we should consider for whom the benefits accrue and for whom they don't with each approach.

ODF as the single standard

"benefits" for end users - a single supportable standard for our children's children.

"benefits" for MS - loss of control of the document standard. No opportunity for FUD around MS Office compatibility since MS would need to comply

OpenXML and ODF as standards

"benefits" for end users - a continuous battle over interoperability with no winner in the best case and a slide back to a proprietary format

in the worse case

"benefits" for MS - Keeps control of "a" document standard which it uses to kill the other more open standard.

Based on the benefits it seems clear that the choices are to reject OpenXML as a standard, embrace ODF and use OpenOffice as the bridge; or trust MS when they say that they really do want to have an "open standard document format" and they will produce translators for the two standards.

Are you willing to trust a monopoly that has already been guilty of illegally using its monopoly to stifle competition?

Regards,
ginny at theotts.org

From: [Andres Paglayan](#)
To: [Standards \(ITD\);](#)
CC:
Subject: real open document formats please
Date: Thursday, July 12, 2007 7:54:31 PM
Attachments:

Hi,

There's a lot of people and ITs who care about the standards being really open and not tainted by corporation bias,

Thank you,

Andres

Women's Health Services
Andres Paglayan
IT Director
Ph: (505) 955-9449
Fx: (505) 955-9429
Mb: (505) 690-2871

Open Source is like Love, the more you share it the better it gets.

--"Harmony is more important than being right"

From: [Mark Richardson](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Dual standards are not good for Massachusetts!
Date: Thursday, July 12, 2007 7:54:19 PM
Attachments:

Dear Sir/Madam,

We are depending on Massachusetts to lead the way in adopting a single open document standard (ODF) that has already been approved many times throughout other countries in the world. Microsoft's offer of XML is a Trojan horse designed to make us suffer through another English units versus Metric units debacle, at best, and at worst, another chance at trying to monopolize the market. Why cannot Microsoft just support the existing standard?

It doesn't make sense and they know it. My wish for you is to put their feet to the fire and find out what they offer that makes Microsoft's XML format superior to ODF. They've got nothing is my fervent belief. They only want to lock you into their product life cycle via XML format changes.

Thank you for taking this time to read my email. I live in Virginia, but have been following this issue for several years now on Groklaw. Massachusetts can be the shining light that other states can follow. Virginia's slow so they need a big brother to help them along <grin>.

over and out,
Mark Richardson.

From: [Kyle](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open standards...
Date: Thursday, July 12, 2007 7:49:35 PM
Attachments:

Short but sweet.. pleeeeeeease don't cave in to Microsoft! Allowing a "standard" that is proliferated with poor design and patent "protection" isn't a standard at all. I hope you guys reconsider!!!

--

09 f9 11 02 9d 74 e3 5b d8 41 56 c5 63 56 88 c0

From: [jdg at patmedia.net](mailto:jdg@patmedia.net)
To: [Standards \(ITD\)](#);
CC:
Subject: Keep ODF as the correct and open standard for documents in MA
Date: Thursday, July 12, 2007 7:34:27 PM
Attachments:

Dear Sirs,

I am writing to express my view on your potential dilution of the efforts you have made towards opening up document management and retention for the state of Massachusetts. I have been cheering the correct and courageous moves you have made to throw off the lock-in forced by Microsoft, and its hazards to long-term viability of document storage.

I think that you have the opportunity to continue to lead the country in applying real standards and interoperability by refusing to cave in to pressure from Microsoft, and continuing to specify the Open Document Format as the true standard and sole acceptable document format.

Please resist the lobbying pressure of Microsoft. They cannot compete on openness and interoperability, and should not be rewarded for having deep pockets and a vast publicity and lobbying force.

Thank you,

John Giachero

From: [Evan Williams](mailto:Evan.Williams@fig.com)
To: [Standards \(ITD\);](mailto:Standards@ITD.com)
CC: [info at rachelkaprielian.com;](mailto:info@rachelkaprielian.com)
Subject: Ecma 376
Date: Thursday, July 12, 2007 7:28:03 PM
Attachments:

I'm a resident of Watertown, MA, and I'm writing to express my great displeasure at the idea that Massachusetts might accept the Ecma 376 standard as one of the official open standards that my state government will be using.

I am extremely upset by this. Ecma 376 is just the Microsoft OfficeOpen XML specification with a very official sounding name, and it has all the properties that made OfficeOpen XML a very questionable idea in the first place.

ECMA standards are very easy to get, and it is not meaningful in any important way.

The idea behind the document open standards for the state government was to provide an archival format that any Massachusetts resident can use with no conflict or requirement to buy anything from anyone. Microsoft has been unwilling to give the assurances needed to make OfficeOpen XML a real standard. It is a proprietary format with the word open in its name.

Please do not allow the state to use it.

Thanks,

--

Evan Williams
ejw at fig.com
20 Oak Street
Watertown, MA
02472

From: [Brian J Berrigan](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ODF Standard
Date: Thursday, July 12, 2007 7:22:02 PM
Attachments:

Back when i heard that the state of Mass had decided that document access was in a confused and sorry mess, i really cheered them on to do something concrete. The intended move to accept ODF/Oasis format for all departments and state documents was a brave and far-sighted step.

Now you seem to have bowed to Microsoft pressure/bribes and are willing to accept OOXML as a standard, BUT it is nothing of the kind. It is another proprietary lock-in attempt by a convicted monopolist corporation with a sad history of not even having document interoperability among their own various formats. This is a cowardly short-sighted backward step on the part of Mass. politicians/leaders(?!). Why undo all the progress you had earlier made to end this morass. Your greed and ignorance are glaringly shown to the world.
BrianB.

From: [Anderson, Dave](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Open Office XML
Date: Thursday, July 12, 2007 7:14:01 PM
Attachments:

Sirs,

I am writing as an individual Massachusetts resident to express my disappointment on hearing that our state is considering the approval of Open Office XML as meeting the state's requirements for an open standard document storage format. The lack of "openness" in Microsoft formats has hindered my work for many years, and the information already known about OOXML makes it clear that this is not about to change. From what we already know about the standard, it is simply impossible for others to create tools that fully support this format because at over 6000 pages it is incomplete. And even if it was complete, it would specify so many bugs, special cases and irregularities that it would be prohibitively expensive. This is to Microsoft's benefit, as vendor lock-in will continue as it has.

ECMA states that the goal of OOXML is to faithfully represent the existing corpus of documents. This is a perfectly reasonable goal, but I contend that that makes it unusable as an open standard. First, the existing corpus itself "represents" the documents, but it is incomplete without application software to view, edit, save and print them. Microsoft is the only provider of software to do this, thus the lack of openness. Why recapitulate that corpus in another format? In order to eliminate the risk that Microsoft may not continue to support access to it in a reasonable way, or simply to enable new capabilities to use it that don't depend on Microsoft's approval. If anyone could point to a tool developed from the OOXML specification that can faithfully view, edit, save and print them, then one could claim that the standard was open. But this is essentially impossible given the requirement that it must faithfully represent the original documents.

Please ignore the lobbyists, and listen to your residents. Dump OOXML in favor of ODF.

Respectfully,
Dave Anderson

From: [marketing](#)
To: [standards at state.ma.us.;](#)
CC:
Subject: Microsoft XML
Date: Thursday, July 12, 2007 6:59:15 PM
Attachments:

As a citizen of Massachusetts I strongly encourage the state not to adopt "Microsoft's OfficeOpen XML specification" standard.

It is not fully open, as a standard. From every thing I have read, there are bits of proprietary code buried in this standard which remain undocumented and well proprietary. Not open.

As a system of desktop software, and operating system in combination, allowing state agency's to purchase Office 2007, or /and Vista, which are the only software that use this "standard", you are requiring the taxpayers of Massachusetts to replace functioning hardware that the life could be extended. The cost to taxpayers will be enormous. Perfectly functional, and open alternatives exist and instead of committing the state to spending hundreds of millions of dollars over the next 10 years to update its desktop computers we should be able to get away with spending an order of magnitude less by black balling Microsoft's system of software solutions which require such high long term costs.

By rejecting the Microsoft OfficeOpen XML specification, you will require change, both by Microsoft, and by state agencies which will result in a more competitive sourcing of software and Lower long term hardware costs for the State of Massachusetts.

Daniel Winter
Owner
Brookline Print Center
70 Coolidge Hill Road
Watertown, MA 02472
617-926-0300

From: [Paul van Erk](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ODF and "the other" XML
Date: Thursday, July 12, 2007 6:58:11 PM
Attachments:

Hello,

I'm not a citizen of Massachusetts. In fact, I don't even live in the USA. I'm live in the Netherlands, but follow open standards closely. When ODF was accepted as an ISO standard, I was thrilled. Especially because you see lots of companies and governmental bodies turn user friendly by using more and more open standards.

However, then came Microsoft with their 'open' standard. Yes, the standard will be open, but Microsoft does have it's way to twisting things around and we will all be held in deadlock, again. It will be MS Office or no Open XML for you. The fact that Microsoft has tried to strike deals that say "we will help you implement Open XML, but only if you don't share it with others" (like the Novell deal) says enough. They do not want true open standards. Why would they need to help you implement an OPEN standard?

So, as a world citizen, I am concerned that by choosing for Microsoft's version of 'Open' XML, you will leave people that choose non-Microsoft software in the cold, eventually.

I'm a Linux and ODF user who tries to 'push' open standards as far as my little power reaches. I recently convinced my boss to at least accept ODT and ODS uploads in our system. It's a small step, but an important one: ODF is a real open format and, from what I've seen, it's also a better one than 'the other' format.

Regards,
Paul van Erk
The Netherlands

--

Website: <http://www.parena.net>

dbKalendar <http://www.parena.net/dbKalendar>

From: [Bruce Pennypacker](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Allowing MS OpenXML as a standard is a BAD IDEA
Date: Thursday, July 12, 2007 6:55:16 PM
Attachments:

To whom it may concern:

I was born in Massachusetts and have been a resident for the past 17 years, having moved back after graduating from college. I have worked in the computer industry for over 17 years both as a software developer and systems administrator. I have been recognized by Microsoft for my work with the Windows operating systems, and have also helped launch a number of successful start-up companies.

I was excited when I heard that the state was planning on adopting the Open Document Format (ODF) for all public documents. A move like this ensures that all public documents are available to virtually all computer literate individuals no matter what types of computers they use. I was equally dismayed when I heard that the state is now considering including Microsoft's OpenXML specification as a second acceptable standard. OpenXML is a standard only because it is a de facto standard, only because Microsoft is a monopoly. Microsoft created and documented OpenXML for two specific purposes. One was to provide a competitive format to ODF and the other was to help reinforce their monopoly by ensuring their specification could NOT be easily implemented on non-Windows platforms.

Over the months since Microsoft released OpenXML a number of people in the high-tech community have performed reviews of this specification. These reviews have shown that there are problems in OpenXML ranging from the most basic mathematic formulas to more complex methods used in formatting word processing documents. For example, the section that describes the implementation of the trigonometric functions SIN, COS, etc. fail to state whether their arguments are angles expressed as radians or degrees. Without knowing the format of arguments passed to and received from functions like these it's virtually impossible to

implement them properly.

In another section of the OpenXML specification there is a definition for a word processing method titled "autoSpaceLikeWord95 (Emulate Word 95 Full-Width Character Spacing)". The OpenXML specification openly admits that the only way to properly implement this method is to use a 12-year-old version of Microsoft Word that is no longer available, reverse engineer the functionality, and attempt to re-implement it. This would be a daunting, if not impossible, task for virtually any software developer to implement. The only company that could easily implement this would be Microsoft since they have the original source code to this 12-year-old version of Word, but they are not likely to share that with any other vendors. This is one example of many dozens that exist throughout the OpenXML specification that makes it virtually impossible for any company to implement fully other than the convicted monopoly Microsoft.

Please reject Microsoft's OpenXML specification as a state standard. Rejecting it now will help make the sharing of electronic documents much more open throughout the entire Commonwealth, and eventually throughout the entire world.

For more information on the issues surrounding the OpenXML specification please see the following documents:

<http://www.robweir.com/blog/2007/07/formula-for-failure.html>

<http://www.robweir.com/blog/2006/01/how-to-hire-guillaume-portes.html>

Thank you,

Bruce Pennypacker
171 Swanton St. #21
Winchester, MA 01890

From: [Steve Rice](#)
To: [Standards \(ITD\);](#)
CC:
Subject: in support of OOXML as the way forward
Date: Thursday, July 12, 2007 6:43:21 PM
Attachments:

Although I don't live in Massachusetts, I have been following your progress towards ensuring that public documents are encoded in an open file format. You are leading the way and I hope the rest of the country follows.

I see the Microsoft proposal as diluting this effort. If their format could be fully explained, it might have merit. That doesn't seem to be the case. It is also odd that multiple formats would be needed if they are truly open and interchangeable. It is much more likely that this is nothing but an effort to derail open formats.

Regards,
Steve Rice
Fremont CA

From: [Eric Goff](#)
To: [Standards \(ITD\);](#)
CC: [PJ at groklaw.com;](#)
Subject: OOXML
Date: Thursday, July 12, 2007 6:37:15 PM
Attachments:

I am writing here to tell you that to accept OOXML in its current form is a grave mistake. What is proposed as a standard contains many mistakes (i.e. formula definitions and spreadsheet functions are flawed). It also contains support for non-standard formats (which defeats the purpose of a standard format).

One subtle point that may be missed, is that Microsoft modeled its standard after its product, instead of the other way around. That means that the standard is so large that few outside programs could ever hope to implement it.

But perhaps you should ask yourself the question.

Why would Microsoft endeavor to make its own standard, instead of helping an existing standard? Does that sound like a company trying to make things easier for the public? Or does it sound like a company bent on enslaving the public to its own format ?

Thank you,
Eric Goff

From: [Peter Linehan](#)
To: [Standards \(ITD\);](#)
CC:
Subject: RE Use of Document standards
Date: Thursday, July 12, 2007 6:36:23 PM
Attachments: [pwl.vcf](#)

Sir/Madam,

While I am not living in the USA, nor and American citizen, I have been aware of your ongoing problems with document standards.

In the UK, the same problem has arisen, and you may care to look at the BBC Website link :-

<http://news.bbc.co.uk/1/hi/technology/6265976.stm>

In reading the article, you may note that Microsoft have supplied a solution BUT that solution involves emulating older operating systems inside new operating systems.

But please consider, in the long term these 'super' operating systems may be superseded; made redundant or vanish completely.

Here in the UK, the original Doomsday Book is still readable - with some difficulty due to the writing; spelling and an ancient grammar.

But the fundamental text is not encoded - it is in an open standard - it is a basic standard.

It is clumsy, it is slow to produce and it takes up space - all arguments being used today against the ODF standard - but it is open.

In contrast, Samuel Pepys' diary, or Leonardo Di Vinci's notes are not available to everyone because, although the encoding is simple, it is still encoding, and becomes another level at which error may be introduced by readers in some future time. I believe strongly that Microsoft's OpenXML falls into this category and should be avoided by any institution that must hold records for all the public for an extended period.

Thanks you for taking the time to read this
yours faithfully
Peter Linehan

From: [jaap](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OpenXML
Date: Thursday, July 12, 2007 6:29:32 PM
Attachments:

Living far away from Massachussetts, in Switzerland, I would like to express my serious concern over the decision to include Microsoft OpenXML in the TRM proposals. This is a very serious mistake, and took me by surprise. I saw Massachussetts as the global lead in the move to proper document standards, but suddenly allowing Microsofts document standard into this is in my view a major step back in time. It gives a free ride to a monopolistic enterprise, which is what an administration should prevent, rather than stimulate.

Enough is said about why this is so bad, Andy Updegrave has already sent you a very clear response, so I won't make this long. Just want you to hear me, and take my concerns into consideration together with all others.

Kindest regards,

Jaap Hoetmer
Route de Gy 26A
CH-1252 Meinier-Genève

Tel: +41 (0)22 7721070
Mob: +41 (0)79 3070709

From: [Craig Van Degrift](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Open Document Format
Date: Thursday, July 12, 2007 6:28:38 PM
Attachments:

Please think carefully before embracing the fake standard proposed by Microsoft for document formats. Microsoft has a long history of locking in customers both openly and with subtle secret "features", and they show no sign of changing that behavior.

Massachusetts needs to be able to read their government documents 100 years from now, long after Microsoft has disappeared.

Two standards is not a satisfactory approach. Imagine if there were two standards for plumbing connections. I actually experienced that while working as a research physicist in Japan. Some of our apparatus used metric plumbing fixtures from Europe and Japan while other parts used "English" plumbing fixtures from the U.S. It was a tremendous headache.

Show that you can pay attention to the people who understand the technology and reject Microsoft's fake "open" document format. ODF is the real thing created by people who have the good of ordinary citizens in mind.

Craig Van Degrift
Retired Physicist

From: [C. Conrad Cady](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please remove support for sham standard ECMA 376
Date: Thursday, July 12, 2007 6:23:42 PM
Attachments:

As I am sure you understand, ECMA 376 is **not** a useful standard.

For example, several sections require the implementor to clone the behaviour of a proprietary product, where the behaviour to clone is not specified. For example:

- * Section 2.15.3.6 page 2161, autoSpaceLikeWord95.
- * Section 2.15.3.26 page 2199, footnoteLayoutLikeWW8.
- * Section 2.15.3.31 page 2209, lineWrapLikeWord6.
- * Section 2.15.3.41 page 2225, shapeLayoutLikeWW8.
- * Section 2.15.3.51 page 2245, suppressTopSpacingWP.
- * Section 2.15.3.53 page 2250, truncateFontHeightsLikeWP6.
- * Section 2.15.3.54 page 2252, uiCompat97To2003.
- * Section 2.15.3.63 page 2264, useWord2002TableStyleRules.
- * Section 2.15.3.64 page 2265, useWord97LineBreakRules.

Specifications that say "do what this product does," instead of explicitly stating what behavior is required, have no place in a standard.

For a full list of technical objections, please see
http://www.grokdoc.net/index.php/EOOXML_objections

Please remove ECMA 376 from your list of accepted document types. It is based on a faulty, unimplementable specification which ECMA should be ashamed of.

Thank you,

C. Conrad Cady
Windows and Linux user doing business with people in the Commonwealth of Massachusetts.

From: [Valden Longhurst](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF is sufficient
Date: Thursday, July 12, 2007 6:21:37 PM
Attachments:

Why would a government agency support a document format from a single-vendor, convicted monopolist? Not only will this action cause Massachusetts government to accrue a higher cost (both upfront monetary and long-term support) in your IT department but also by all your constituents who have to purchase additional software to read Microsoft's OfficeOpen XML specification.

With ODF you have no lock in, you have more cost savings, and you have a wider array of applications that will integrate with it. The critical issue to understand what we are saying is based on an openness that does no lock down both you and the public at large. Microsoft's OfficeOpen XML not only supports the chains of dependency leading to Microsoft but also raises issues addressed here:

<http://www.groklaw.net/staticpages/index.php?page=20051216153153504>

If you are serious about considering our feedback to your proposal, then please read the comments many have already made at the groklaw.net site above.

Thank you for asking for our input and I hope you are serious about considering our feedback.

From: [felix at crowfix.com](mailto:felix@crowfix.com)
To: [Standards \(ITD\);](#)
CC:
Subject: Ecma 376 / OOXML
Date: Thursday, July 12, 2007 6:19:57 PM
Attachments:

PLEASE don't use the terrible Microsoft OOXML standard. It is very poorly written and locks citizens to more invisible Microsoft documentation. The whole point of your open standards exercise is to let ALL citizens read government documents, not just those who own a current Microsoft computer. What happens when Microsoft no longer supports ten year old documents? What happens when Microsoft comes out with new software which creates documents that can't be read by old programs? Are you going to seriously tell all your citizens that they can only read the latest laws, tax regulations, health codes and building codes and safety regulations only if they buy a new Microsoft computer every year or two?

PLEASE PLEASE PLEASE standardize on a real open standard, not the trap set by Microsoft.

--

... ..
Felix Finch: scarecrow repairman & rocket surgeon / felix at crowfix.com
GPG = E987 4493 C860 246C 3B1E 6477 7838 76E9 182E 8151 ITAR license #4933
I've found a solution to Fermat's Last Theorem but I see I've run out of room o

From: [Anand Rangarajan](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF and OOXML
Date: Thursday, July 12, 2007 6:18:51 PM
Attachments:

TO WHOMSOEVER IT MAY CONCERN:

I understand that this seems like a legitimate debate. My purpose in writing this letter is to try and convince you to look at the situation from a technical perspective. Lately, looking at things technically is on the wane particularly in the US but we persevere. On the one hand, you have the incumbent 900 lb gorilla Microsoft and their gargantuan OOXML spec which looks like an open spec until you look closer. On the other hand, you have the challenger ODF with a few scattered implementations - OpenOffice and KOffice - and a lean, mean, clean spec which has not been truly tested in the marketplace. For a state with the Boston Tea Party in its history, the choice should be clear. The cleanliness and the openness of the ODF spec should overwhelm the shoddiness and downright ugliness of the OOXML spec right? But, here come the lobbyists and the spin doctors and now we don't know what's going on. We don't know wrong from right.

Do the right thing. Just as in 1776, we now have a chance for a new beginning with ODF - a level playing field. We have new frontiers that will open up and a new bunch of open source cowboys to go forth and explore. Microsoft can always implement the ODF spec - they have the resources. Don't become a corporate shill and roadkill from the perspective of history. Let the state of Massachusetts be a beacon for freedom once again.

Sincerely
Anand Rangarajan

--

Anand Rangarajan

Associate Professor Work: +1 352 392 1507
Dept. of CISE Fax: +1 352 392 1220
CSE Building, E301 e-mail: anand at cise.ufl.edu
University of Florida URL: <http://www.cise.ufl.edu/~anand>
Gainesville, FL 32611-6120

From: [Aaron Baff](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Response to Massachussettes using Microsoft OpenXML Specification (Ecma 376)
Date: Thursday, July 12, 2007 6:14:44 PM
Attachments:

Sir/Ma'am,

I am a former resident of Massachusetts having moved away for military service. I am a computer programmer and from when I first heard that my former state was going to use Open Document Format (ODF) I was thrilled that finally, a good, high quality standard was going to be used by some government in the USA and that Microsoft would not be able to bully its way in with a locked-in document format. This would let me read, in perpetuity, all of the published documents using whatever software I wanted without having to pay several hundred dollars to buy a Microsoft product which may or may not run on the my Operating System of choice.

Then I heard that you were considering allowing MS OOXML, and I immediately believed the worst. Microsoft had yet again bribed, bullied, or otherwise compromised what promised to be the most progressive and forward thinking state IT department. Fortunately I found information saying I could write to you to express my feelings on the subject before any permanent decisions would be made.

Please, do not allow any company to muddy the water with various claims that it is an open standard even if it can claim to be an ECMA specification. If you truly look at it, it is a mass of technical specifications, some parts of which must be licensed from Microsoft in order to implement the specification with 100% compliance. Now look at ODF. Total and complete cost to fully implement the standard is \$0 in any form of licensing costs. In fact, you can simply take other ODF code out there in existence right now, and put together your own software to let users read and write ODF.

One final remark. ODF was developed by many companies throughout the industry with input from many highly respected individuals who's first thought was letting anyone freely (as in freedom) implement the standard. In fact no one person or company has control of the standard. Microsoft is truly the one and only entity that has control over the OOXML Specification, and what direction it will take in the future and, more importantly, _who_ is allowed to do _what_ with the specification.

Concerned friend,
Aaron Baff
crizt321 at gmail.com

From: [Peter Linich](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Completely open standards
Date: Thursday, July 12, 2007 6:09:36 PM
Attachments:

Hello,

I hear you guys are considering document storage standards to use in branches of government. I have been working as a system administrator for three decades now, and making sure that old documents and files are usable and recoverable, months and years from now, is something that I *often* deal with.

This shows up a lot in the area of backing up corporate data, and information we're required to keep available basically forever.

There are two parts to this: storing the data, and making sure that it's usable.

Storing the data means making sure that we can save it somewhere *and get it back when we need it*. With backup technologies ever increasing in capacity and speed, there are lots of times when we discover that backups made by users, even as little as five years ago, are on some sort of tape or disk for which players and readers just aren't made any more. Manufacturers won't keep making old and slow equipment for the few people who need to recover old data. They make the new and fast equipment that people want to buy.

For us, this means that we both keep lots of old drives around, and we also regularly transcribe from old media types to new media types to make sure old data is available from new readers.

Making sure that old data is usable, is another big problem.

We work in a research and administration environment (in a university), and have legal and administrative requirements to keep school records and research available forever.

Lots of computer programs come and go, and we frequently get presented with floppy disks or tapes of data from some amazingly important project, or to do with some long-ago semester, which has all been written by some popular computer program at the time, but which no longer is available. Imagine, if you can think back that far, how much software was based on DOS, but which all quickly went out in the bin when Windows came along.

Sometimes we can recover the information, if the media is readable, and using things people can remember, by writing custom computer programs. But, sadly, a lot of the time, mainly because there are no documents describing how the data is stored and how it needs to be interpreted, we end up saying to the user, "Sorry, but we can't help you with this". E.g. we might be looking at some long-extinct word-processor file and find the word "advanced", but not know if it was bold, italic, large, small, or part of a title or footnote.

I'd like to urge you, when considering what standards to use, to help people like me in the future, by choosing ways of storing, representing and using data and documents, so that should a time come in some future where the original programs which created the data or documents no longer exist, we have a good chance to recover whatever our future users need from the stuff stored today.

We can best do this, in the absence of the original programs, by having and ensuring the easy use of open and public standards with nothing hidden for both storage *and* representation of data and documents.

Thanks for reading, and have a great day :)

--

Peter Linich
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From: [Adam Konkle](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Comment on use of ECMA376
Date: Thursday, July 12, 2007 5:59:56 PM
Attachments:

As I'm sure you are aware, the use of communication formats which are easily understood is very important.

While books written with pen and paper have been around for several hundred years, attesting to their longevity, some of these written documents have changed in their use of language. These documents must now be translated and interpreted to make any sense to those that wish to read them now.

The same situation, only worse, will happen over time with the electronic documents that Massachusetts creates. Should Microsoft's Office Open XML be chosen, it would be similar to trying to create a computer keyboard with only the instructions that the keys should be arranged the same as they are for a typewriter. If you have neither a computer keyboard (to copy) nor know how a typewriter looks, it would be impossible to arrange the keys. That is the exact scenario that MS OOXML presents - it requests layout options based on referencing previous copies of Microsoft office, but not explaining what those layout options should be.

By using ECMA 376, you may ensure that your documents may be around for the ages, but much like early Egyptian tablets, they may not be readable.

Thank you for your consideration in this issue.

Adam Konkle

From: [Sean Ellis](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OOXML Adoption
Date: Thursday, July 12, 2007 5:55:06 PM
Attachments:

Dear Sir/Madam,

As a user and supporter of open standards, I am writing about your proposed dual adoption of the ECMA 376 (OOXML) standard for digital document storage, alongside ISO/IEC 26300 (ODF).

No doubt there have been many people emailing you on this subject; I will therefore confine myself to the one feature of the OOXML standard that I think is most representative of the problems as a whole.

It is this section:

"2.15.3.6 autoSpaceLikeWord95 (Emulate Word 95 Full-Width Character Spacing)"

"This element specifies that applications shall emulate the behavior of a previously existing word processing application (Microsoft Word 95) when determining the spacing between full-width East Asian characters in a document's content."

The wording of the standard is ambiguous or incomplete in many areas, but nowhere so blatantly as this tag. The specification contains no information about how Word95 spacing actually works, nor is this information available anywhere else, even, apparently, to the writers of the specification:

"[Guidance: To faithfully replicate this behavior, applications must imitate the behavior of that application, which involves many possible behaviors and cannot be faithfully placed into narrative for this Office Open XML Standard. If applications wish to match this behavior, they must utilize and duplicate the output of those applications. It is recommended that applications not intentionally replicate this behavior

as it was deprecated due to issues with its output, and is maintained only for compatibility with existing documents from that application. end guidance]"

The required behaviour "cannot faithfully be placed into narrative" - this is astounding language for a ratified international standard!

The specification authors admit openly that the only way to properly implement this behaviour is to obtain a 12-year-old program, now out of production, reverse engineer it, and translate its idiosyncrasies (and possibly defects) into new programs, without the help of the original authors. This effectively increases the development cost of an implementation of the specification, except preferentially for a single vendor, Microsoft.

It also raises the problem of indemnification against any patented methods revealed by this process. Microsoft's patent undertakings during this process are less than clear in the first place, and since any patent-encumbered methods that may be discovered are not mentioned in the specification, they may argue that any patent licensing agreement relating to specification itself does not apply. Microsoft, unfortunately, has a long history of using vague threats over patents to stifle competition and innovation, a practice which is still ongoing.

As I have said, the autoSpaceLikeWord95 tag is just one of many high-profile, well-documented, and egregious problems with this specification. The OOXML specification does nothing of significance over and above ISO/IEC 26300, and is thus, in my view, redundant as well as fatally flawed.

The issue of standards adoption in Massachusetts has become a talking point, touchstone, and cause celebre for the free software community, both in the US and elsewhere around the globe. Please, therefore, stand firm and reject this unacceptable "standard".

The eyes of the world are upon you again.

Yours

Sean Ellis
Surrey, UK

From: [Ken Snider](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Microsoft OOXML addition proposal (now Ecma 376) as an "open standard"
Date: Thursday, July 12, 2007 5:54:04 PM
Attachments:

To whom it may concern,

I wanted to voice my concerns over the suggested approval of Microsoft's OOXML standard for inclusion as a proposed "open standard" for document exchange.

Though Microsoft has had Ecma certify the standard, it is, by no means, "open". The core components of the standard - that is, the components that convey actual document information, are encumbered by patents and licences that preclude third-party developers from being able to create works that make use of the technology within the standard - unlike every other standard certified.

Approval of this standard would result in precisely the result I believe you were trying to avoid - being locked into one vendor (or a subset therein), without the option to have third-parties create future-proof applications to read these documents in the future. While the format of the files may now be "open", the content is not, and it is, in essence, no different from .DOC - and cannot be unless Microsoft removes the patent encumbrance (and restrictions therein) that this standard has.

It does not meet any sufficient definition of "open", and should NOT be considered for inclusion.

Thank you.

--

Ken Snider

From: [claudekroloff at bellsouth.net](mailto:claudekroloff@bellsouth.net)
To: [Standards \(ITD\)](#);
CC:
Subject: Governance and Open Standards
Date: Thursday, July 12, 2007 5:51:03 PM
Attachments:

To Whom It May Concern:

Please take into very serious consideration your contemplation of Microsofts OOXML as a 'Standard'.

The state of Massachusetts had it right the first time when they first proposed using an open standard which is truly open by adopting ODF. This is an ISO standard and what more powerful message can we say to the rest of the world by adopting the ISO standard vs OOXML?

Those who ignore history are doomed to repeat it. This is a famous saying and is worth its weight in gold. Microsoft has proven through out its history that it does not play fair and ignores the rules when it comes to remove competitors. OOXML is not an open standard and is only a standard that will benefit Microsoft since it comes from them. Please also remember, that even Microsoft's products aren't even backwards compatible with each other!

I hope, that as representatives of your public, you follow your original goal and adopt a true open standard - ODF. And remember, when you made the original declaration, it was Microsoft that chose not to play by opening up their application to others and now they want to claim that their product is a viable standard? No, standards are standards - how many standards are there for inches? for ounces? etc.

Good luck and may you do what is the right thing for the public, for history and for your future generations by ensuring government adopts a true open standard.

Sincerely,

Claude Roloff
Kennesaw, GA

From: [Douglas Thomas Hayden](#)
To: [Standards \(ITD\); PJ at groklaw.com; sarcasticassassin at gmail.com;](#)
CC:
Subject: Open formats for computer files
Date: Thursday, July 12, 2007 5:48:02 PM
Attachments:

I am writing in support of using ODF (Open Document Format) as the standard for computer files to be used to capture, report, and archive the records of government business.

There are two reasons that I prefer it to other candidates, notably OOXML.

First, it is completely documented, as a standard must be for it to be useful. This means there is less chance of a file being unreadable simply because the program with which it was created is no longer available (Microsoft Word version 1.0 comes to mind, although XYWrite is also tricky).

Second, because the community effort that produced ODF and advocated for its adoption as an ISO standard has proven to be very nimble in providing what the users of such formats desire (methods for the disabled to use it, for example). It is more than just a piece of work for this community, it is a statement of intent that the community considers flexibility to be important, as well as enhancement to meet the needs and desires of the USER community.

I mentioned OOXML in an unflattering way because it claims to be open, and a standard, but locks away (in unreadable, binary, copyrighted and patented form) key components of its specification, preventing improvement by a third party with a need for that improvement (special characters and formatting unique to the legal and legislative process come to mind).

I sincerely hope you will consider these points in making your decision on a format to preserve the records of the Commonwealth as the future unfolds.

Sincerely,

Douglas Hayden

From: [Rafael A Diaz](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Microsoft Open Standards
Date: Thursday, July 12, 2007 5:43:11 PM
Attachments:

Please be aware that Microsoft's definition of "open" is not the communities. Please do not allow MS to put Forth a closed solution in the guise of an open standard.

Thank you,

Rafael Diaz
Systems Administrator
Gymboree Corp
[rafael_diaz at gymboree.com](mailto:rafael_diaz@gymboree.com)

From: [Richard Groot](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ODF, not OOXML
Date: Thursday, July 12, 2007 5:34:31 PM
Attachments:

Gentlemen,

I encourage you to reject OOXML in favor of the existing ODF standard. ODF can be easily extended to cover any missing bits that Microsoft needs in order to faithfully represent their documents. Inventing a new standard that doesn't improve on an existing one simply confuses things and dilutes effort.

Thanks,
Rich Groot

From: [Roger](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open standards for documents..
Date: Thursday, July 12, 2007 5:30:59 PM
Attachments:

I'll be brief. I'm not a resident of Mass., but feel that what's going on in your fine state is a bellweather for what will transpire elsewhere. Microsoft's, so called Open Standard document format, "OpenXML" is a proprietary format clearly intended to produce vendor lock-in, in spite of their protestations to the contrary. It's the Microsoft way of doing business. A perfectly good ISO standard exists in ODF. It's no big deal for them to interoperate with ODF files. See <http://www.groklaw.net/article.php?story=20070712160114539> for more details and links.

Please, for the rest of us out here looking on, do not allow the Microsoft lobbying onslaught to carry the day. Back in the early days of using personal computers, I used a word processing program called Wordstar. None of the files I have from that period would be readable today....if I didn't have a working copy of the program. I don't want succeeding generations of citizens to be unable to read electronic documents produced by the various units of government around the country. There must be one standard and ODF already exists and serves the purpose well.

Keep in mind that Microsoft is a convicted abusive monopolist, that just happens to have Billions of dollars in their war chest. Money should not prevail over common sense.

Thanks for your consideration.

Roger Whitaker

From: [Rich Shepard](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Digital Document Standard
Date: Thursday, July 12, 2007 5:22:09 PM
Attachments:

It is vitally important to everyone who might want access to Executive Branch digital documents in the future that access is assured, regardless of what application software is used. The only universally approved standard is the ODF (Open Document Format). Using this format allows everyone to view the same content in the same layout. Most importantly, it is not tied to a specific vendor or version of an application.

Microsoft has for more than 20 years used non-standard and proprietary data formats in an attempt to force everyone to buy and use their software. While we have run our business using linux-hosted software for the past decade (and have no problems sharing documents with clients and regulatory agencies), many of the latter have complained that their old Microsoft Word documents can no longer be accessed with their current software.

Government has a responsibility to both current citizens and future ones that information and decisions are available in a useful format. Paper, while having the greatest longevity, is expensive to store and maintain in good condition. Also, paper documents cannot be quickly and completely searched for relevance to a particular topic. Digital documents overcome these limitations, as long as the media on which they are stored retains its integrity and that the format is vendor and application neutral.

You approved the use of ODF, and there is no need for a second (or third) document standard. Think of the implications if vehicles produced by Ford and General Motors had different standards for the layout of controls.

One, internationally-approved digital document standard is all everyone needs. That one is ODF.

Rich

--

Richard B. Shepard, Ph.D. | The Environmental Permitting
Applied Ecosystem Services, Inc. | Accelerator(TM)
<<http://www.appl-ecosys.com>> Voice: 503-667-4517 Fax: 503-667-8863

From: [GrokLaw OnceOnly](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Enterprise Technical Reference Model v. 4.0 Public Review Draft
Date: Thursday, July 12, 2007 3:44:20 PM
Attachments:

See:

Questions for Microsoft on open formats

<http://news.bbc.co.uk/1/hi/technology/6291124.stm>

and please... do not include the Microsoft "not-open" OOXML format in the Enterprise Technical Reference Model v. 4.0 -

Microsoft's use of the word "open" is a sham and one has to question if it is or is not an outright lie in order to twist the weak minds of some into thinking that Microsoft's formats are open. Read Microsoft's dirty tricks url below to see how Microsoft acts with others and standards. You can not change those Microsoft Monopoly based formats in to spots of a different color (the MS formats are not OPEN at all).

Support -only the ISO Open Document Format (ODF) as this is the only truely open format... that has been developed by a group of individuals, education folks, business folks for it to be a usable format for the next 200 plus years.

Reject - the Microsoft OOXML fomate one is a marketing play on words that is solely owned and developed by only Microsoft!

The Microsoft business strategy is to NOT have a long lasting standard format, instead Microsoft's formats are now and have been designed as only a Microsoft ONLY usable format (the is a format that you know they must change to make the commonweath upgrade it's software to a newer format in the future). If you didn't have to change formats you would not have to upgrade.

So, over the next 200 years will ISO ODF be a lower cost solution - Of course it will be - because it is

also a "free to use" format that is designed to last a user 200 years and longer.

Microsoft does not want the commonwealth not to pay them money to upgrade... they want the money paid every 3-4 years for the next new format they will invent for one reason (only to make money for Microsoft).

How many times do we need to buy another word processor... with ODF it will be never as software like OpenOffice.org is free to use... just ask the country of FRANCE as their tax department is using OpenOffice.org and ODF on about 80,000 computer (works on Windows, Linux, and Apple computers freely).

If you would like information on how Microsoft plays (or does not play fairly)...

See:

http://www.grokdoc.net/index.php/Microsoft%27s_Standards_History

and

http://www.grokdoc.net/index.php/Dirty_Tricks_history

in this section you can read all about:

" MS OfficeOpenXML

MS' answer to ISO Open Document Format. OfficeOpenXML is an ECMA standard, Ecma-376, that implements MS Office 2007 (note, MS Office does not follow or implement the standard, it is the other way round). MS has played as dirty as they could to fight ODF. Just browse Consortium Info, Walt Hucks' blog, or Groklaw's ODF/XML page and follow the links for the story of ODF in Massachusetts and EOOXML in general. A quote from James Love on participants of the "Internet Governance Forum" on open standards:

Many people are nervous about these issues, because Microsoft is investing millions to defeat them, and to attack personally government officials who Microsoft sees as too friendly to open standards, and to reward politicians and government officials who back Microsoft.

This is no empty threat. Look at the story of Peter Quin, a government official who dared to back ODF.

It is rather common to encounter cynicism with respect to Microsoft's intentions with the standardization efforts around EOOXML. EOOXML needs ISO approval to be eligible for governments bids because "Governments worldwide mandate that only internationally agreed open standards are acceptable when creating documents". A good example of the common feeling is found in Six thousand pages, one month, no chance...:

Its preferred answer is to create its own open document format - OOXML - which can then be recognised as such by the international standards bodies. However, it does not want this to be something that its competitors can adopt freely.

The answer is to game the system. As part of this, the company has created (by itself, unlike Open Doc) a proposal for OOXML that is six thousand pages long, and then put it into the fast-track approval system with very minimal time for discussion and objection.

....

GrokDoc has a page to file EOOXML objections to the ISO fast track procedure and two Groklaw articles explaining it, Searching for Openness in Microsoft's OOXML and Finding Contradictions and Deadline Looms to Express Concerns about ECMA 376 Office Open XML, with the usual plethora of insightful comments. For a quick comparison of ODF and EOOXML, see Rob Weir's OpenOffice.org Conference 2006 presentation. This also goes into performance questions. A more extensive comparison is given by The Open Document Fellowship, both in general terms and in more technical terms. Sam hiser has written an excellent summary of the differences in "usability" of the standards Achieving Openness: a closer look at ODF & OOXML, a must read for the arguments.

The ODF standard was designed with (legacy versions of) MS Office documents in mind. In contrast, EOOXML was not developed as a standard, but as a description of MS Office 2007, without regard to anyone else (see this historical comment on the mindset of MS developers). Therefore, EOOXML implements mostly a subset of what is possible under ODF. This history is explained in a Groklaw comment by Garry Edwards.

In short, MS claims EOOXML is needed because ODF cannot represent all legacy MS Office formats and is

inefficient. The ODF "camp" has created the Da Vinci converter plugin and claims 100% round-trip fidelity between ODF and the last MS Office binary formats. Furthermore, this plugin also proves the efficiency of the ODF format. Note that the final release of MS Office2007 mysteriously broke the plug-ins as discussed by Dana Blankenhorn in Microsoft playing three card monte with XML conversion.

We learn the real reason MS couldn't standardize on ODF from Bill Hilf of MS himself, as recorded by Dinesh Nair in the Open Malaysia blog:

What got really interesting was when Yusseri raised the issue of OOXML and why didn't Microsoft just work on ODF in collaboration instead of creating a new, bloated standard. Bill's answer was quite surprising, as he clarified that the file format (OOXML) was a part of the software and that OOXML and the software (MS Office) are quite inseparable. Ergo, OOXML is an integral and inseparable part of MS Office. That's why they could not adopt ODF as the file format for subsequent versions of MS Office.

So all the rumours that OOXML is nothing but a dump of Office2007 and not an international, free and open standard are now confirmed by a MS spokesman.

In the run-up of the decision whether or not EOOXML should take the ISO fast track, MS tried to convince the National Bodies that they are not allowed to vote against EOOXML because EOOXML could physically exist next to ODF (succeeding with the US NB), see Rick Jelliffe's and Brian Jones' blogs. This campaign tried to confuse the technical bodies with an unreasonable strickt technical definition of a contradiction, ignoring the fact that this phase is intended to identify obstacles to trade (monopolies) and violations of international trade rules as is explained by Marbut. The campaign even became comical, see Open Malaysia:Microsoft's Definition of Contradictions and The Art of Rewriting History. It didn't work that well, given that many countries filed objections, see Andy Updegrave's blog post and his comments on the actual responses.

In the end, MS seem to just buy their way to an ISO standard by swamping the voting members with their

employees. So MS will have a majority by making sure that most voting individuals are on their payroll.

(On a personal, opinionated note: What is the worth of a voting system where the majority of the voters get sacked if they vote against a single entity)

[edit]

Licensing

MS EOOXML is advertised as an "Open" standard by Microsoft. So it is expected that the license for it's use will at least match the openness of ODF and PDF. Two questions will be asked by any prospective user:

1. Can someone stop me if I write and distribute an application that uses this standard?
2. Under what conditions can I use this standard?

For ODF and PDF the answers are, respectively, Noone

(1) and some conditions on the use of the name PDF

(2). How is this for EOOXML?

Microsoft has written the standard and currently has the only working implementation of EOOXML. Therefore, MS are the only ones who know what copyrights and patents must be licensed from MS and third parties to implement EOOXML. But as of January 2007, Microsoft have consistently refused to identify the copyrights and patents that must be licensed to implement EOOXML. The language used by MS in the EOOXML licenses and "covenants not to sue" is so intricate (and peculiar), that many people still doubt whether it really allows anyone but Microsoft to implement EOOXML. Microsoft has changed the licenses for EOOXML during the years. The initial offer for licensing was seriously flawed as of March 2005. In December 2005, there were still major worries about the pledges not to sue by Microsoft and the ECMA terms of reference. But as late as the start of 2007 there were still doubts whether it would be legal to implement the standard in a meaningful way. To quote the conclusion of Analyzing the Microsoft Office Open XML License:

In this way, the License is stated and is to be perceived as a threat rather than a promise. In effect it says 'Stay away! Microsoft is the only entity which may implement the Microsoft Office Open XML formats!' This is a fundamental contradiction of the purpose of an open standard.

In the comments section of this blog, Marbux remarks that the peculiar language chosen for the EOOXML license makes him conclude that

But as a legal foundation for building apps that can take thousands of person-hours, this covenant not to sue is legal quicksand of unknown depth.

Or, as Andy Updegrove puts it:

And taking that concern a step further, consider the fact that OOXML also apparently violates section 2.14 of the ISO/IEC Directives, Part 1, in that not all of what it takes to implement OOXML appears to be covered by Microsoft's patent pledge, in two respects.

First, the pledge does not explicitly cover material that is referenced, but not included in the specification, and second, the Microsoft patent commitment does not cover optional features. Sections of OOXML that are not fully described include those that require compliant implementations to mimic the behavior of Microsoft products, such as those products and capabilities referred to above (OLE, etc.) Microsoft will need to clarify whether its patent commitment will in fact extend to these requirements. Potentially, these concerns would involve large portions of OOXML, in contradiction of the ISO/IEC requirement that more than a bare-bones implementation must be permitted without fear of infringement.

Most of this is also discussed in Searching for Openness in Microsoft's OOXML and Finding Contradictions and the GL EOOXML objections project page. There is also a Microsoft commissioned evaluation of the license by Baker and Mackenzie from 2006. See, eg, these discussions on GL and the Grokdoc Talk:Objections page. Basically, the Baker and Mackenzie does not address any of the criticisms leveled against the two licenses: Covenant Not to Sue (CNS) and the Open Standards Patent (OSP) license. The report has some careful choice of words, but nowhere does it state that a blanket patent license is given for implementing the EOOXML specifications in full.

This all can lead to rather comical dialogs with MS legal representatives as was exemplified in this OpenMalaysia blog Billions of Documents. At a SIRIM

TC4 meeting on ECMA 376, Microsoft was represented by Stephen Mutkoski (a lawyer). A member of the technical committee asks a simple question:

They sent a lawyer to a Technical Committee briefing. Okay, perhaps we could get more legal information then.

...

So if Macros are not included in Ecma 376, will developers who develop it independently get sued?"

"I will have to get back to you ..."

To summarize the licensing problems, the answers to the above questions for your future EOOXML compliant software can be provisionally given as:

1. Microsoft can stop any attempt to distribute your application
2. You need permission from Microsoft for every application of EOOXML on a computer

[edit]

(In-)Compatibility with other standards

MS wants its own XML format to be an ISO standard. However, MS' format does not conform to many other ISO or W3C standards. You might even think MS doesn't like the W3C ;-): See eg, Wikipedia, OpenDocument Fellowship, Open Malaysia: MSOOXML's disregard for existing standards and, of course, Bob Sutor's blog. See also this GL discussion:

Again from the newspick: a description of why ODF and OOXML don't interoperate.

Office Open XML unquestionably duplicates or at least significantly overlaps with the ODF specification; moreover, unlike Office Open XML, OpenDocument incorporates still other standards such as XPath, XLinks, SVG, XForms, and MathML. Office Open XML reinvents the wheel at every turn rather than relying on existing open standards. The failure to implement XPath in Office Open XML is particularly problematic; it makes full fidelity in automated XSL transformations to and from other XML formats next to

impossible. That problem creates a contradiction in the ISO sense; full interoperability between ODF and EOOXML applications is infeasible.

According to the Wikipedia Xpath is the following:

XPath (XML Path Language) is an expression language for addressing portions of an XML document, or for computing values (strings, numbers, or boolean values) based on the content of an XML document.

The XPath language is based on a tree representation of the XML document, and provides the ability to navigate around the tree, selecting nodes by a variety of criteria. In popular use (though not in the official specification), an XPath expression is often referred to simply as an XPath.

Originally motivated by a desire to provide a common syntax and behavior model between XPointer and XSLT, XPath has rapidly been adopted by developers as a small query language.

I gather that if OOXML do not implement Xpath, then documents in this format cannot be queried using normal XML tools. For example Wikipedia says the following on XSLT.

XSLT is a specific kind of template processor primarily designed to "transform" XML documents into other XML documents. The original document is not changed; rather, a new document is created based on the content of an existing one.[3] The new document may be serialized (output) by the processor in standard XML syntax or in another format, such as HTML or plain text.[4] XSLT is most often used to convert data between different XML schemas or to convert XML data into HTML or XHTML documents for web pages, or into an intermediate XML format that can be converted to PDF document

[snip]

XSLT relies upon the W3C's XPath language for identifying subsets of the source document tree, as well as for performing calculations. XPath also provides a range of functions, which XSLT itself further augments. This reliance upon XPath adds a great deal of power and flexibility to XSLT.

What strikes me of such tactics is they are borderline on misrepresentation. When a supplier says he is using XML, most IT managers will understand a reasonably complete suite of XML related standards will be used to generate the full benefits of XML. By silently picking and choosing which standards in the XML suite they implement, Microsoft breaks this assumption without informing its customers.

Open Malaysia has a very nice writeup on the VML (non-)deprecation in MS EOOXML Is VML in or out now, or was that a typo?.

So:

- * 1. VML is included for backwards compatibility reasons only.
- * 2. DrawingML is newer and richer and designed to replace VML.
- * 3. VML is deprecated and only included for legacy reasons
- * 4. New applications are strongly encouraged to use DrawingML instead

This simply begs these questions:

- * 1. Why then is Section 2.3.1 explicitly using VML?
- * 2. Where are the instructions for using DrawingML instead?
- * 3. If DrawingML is richer and designed to replace VML, why have VML in the first place?
- * 4. I would take it that Office 2007 is a "new application" and should use DrawingML instead of VML. Does it?

What is extra interesting is the long first comment from Stephane Rodriguez who explains that VML was implemented to lock the internet, IE, to MS Office.

So the Office team at Microsoft could not manage to get rid of VML. It is possible, unless they intentionally use it as a lock-in tool, that next version of Office, codenamed Office 14, will be the first one to have an Office-wide DrawingML implementation. Until then, Office 2007 is at odds with the specs that Microsoft is pushing and as a result, it is not a reference implementation of the

specs! In other words, since there cannot be a non-Microsoft implementation of the specs (it will take at least ten years for a company starting now, and it will never achieve 100% fidelity since many things are missing in the specs), it follows that there is simply NO reference implementation out there! Quite amazing...

Standards flouted in MS EOOXML (see also Rob Weir's ooocon2006 presentation and Andy Updegrove's The Contradictory State of OOXML):

- * Codes for the Representation of Names and Languages ISO 639

- * Computer Graphics Metafile ISO/IEC 8632

- * XLink W3C

- * XForms W3C

- * XPath W3C

- * SVG W3C

- * MathML W3C

- * SMIL W3C

- * Gregorian Calendar ISO 8601

(EOOXML redefines leap years and uses two start dates for counting, 1900 and 1904, see also Brian Jones' apology blaming the bug on a programming shortcut in Lotus 1-2-3.)

The 1900 leap year bug is an excellent illustration of how Microsoft treats standards as documentation of their code binaries, including all legacy bugs.

Other links

- * The Future of Lock-in

- * Game Time for OpenDocument

- * Searching for Openness in Microsoft's OOXML and Finding Contradictions

- * Deadline Looms to Express Concerns about ECMA 376 Office Open XML

- * Standardizing away the world's languages

- * Cum mortuis in lingua mortua (SVG/VML)

- * OOXML has poor XML Element names

[edit]

Office2007 implementation

At the start of 2007, only Office 2007 implements EOOXML. However, it is reported that Office2007 does prefer a binary format after all. Allegedly, for

performance reasons.

This GL comment says it all (see also this continuation)

Checking the Rob Weir blog I notice that MS Office 2007 is not using OOXML after all. There is yet another binary format that is silently introduced and touted as the preferred option.

Rob Weir says: It is also interesting that Microsoft is positioning this format as the preferred one for performance and interoperability. The online help for Excel 2007 says: In addition to the new XML-based file formats, Office Excel 2007 also introduces a binary version of the segmented compressed file format for large or complex workbooks. This file format, the Office Excel 2007 Binary (or BIFF12) file format (.xls), can be used for optimal performance and backward compatibility.

The Gary Edwards blog (from the newspick) posted another finding of Rob Weir that I wasn't able to locate on his blog.

Another interesting point, courtesy of the inexhaustible Rob Weir, is that MSOffice 2007 has the unique ability to produce two kinds of EooXML. I've never seen an application do this before, and one has to wonder why?

What Rob discovered is that if you import a legacy BoB into MSOffice 2007, the application will convert it to EooXML fully preserving the originating application binary encodings \u2013 even doing so within laughably and descriptively colorful named XML tags. Fine. We can easily do that with ODF using the infamous tag model. No inadequacy to be found here. (Damn, if only we had patented that technique. Phil Boutros must be lapping this up :) One of the examples Rob pointed out is the use of the long since deprecated VRM encoding. Good work MSOffice 2007!

Next Rob re created that same legacy document \u201cnatively\u201d in MSOffice 2007. Exactly the same! Saved it as EooXML. Then examined the XML, comparing the two EooXML files. Well well well. They are substantially different! Same application. Same file format. Same document content and presentation.

Different EooXML! Interestingly, for one thing there is no VRM encoding. It's been replaced by the proprietary application/platform dependent but forward Vista ready DrawingML.

Some will argue that this is the only way to preserve backward compatibility. I would argue that this will result in an information nightmare. Only one of the EooXML files is backwards compatible. The other is ready for the Vista bound information processing chain centered on the Exchange/SharePoint Hub. How are organizations going to keep things straight?

How can someone interoperate with Office 2007? People will have to sort out which of the ever changing file format is being produced. ISO standardisation looks pretty much like a decoy. It can be used (if at all) to send information in the MS Office suite but it will never get out. Governments that want standards for sovereignty purposes will get a "standard" but not the sovereignty.

Here is Bob Sutor's opinion from We have proprietary extensions to Microsoft Office Open XML already.

Here's an idea of how things are already reverting to the same old behavior, right when Microsoft is trying to convince the ISO how wonderful for interoperability their spec is supposed to be.

One point being made in several places, eg, in MS Office 2007 is not using OOXML, is that Visual Basic macros in Excel (VBA) are stored in a binary (unreadable) form in EOOXML (they are not described in the standard). That is, the ASCII VB macros cannot be exported to another application using EOOXML. An anonymous comment in this blog claims that VBA macros are Excel internal and have no use outside. But other applications are implementing VB too, so that argument is incorrect.

To summarize, MS warn users to not use EOOXML to store a large spreadsheet because of bad performance and that EOOXML cannot represent all information in Excel2007. These posts also suggest that a lot of the attacks on ODF, eg, bad performance on large spreadsheets (and here) and inability to represent all of MS Office features, were pre-emptive strikes to divert from the shortcomings of EOOXML itself. (and

some find OO.o is faster than MS Office)

[edit]

Alternative Implementations

As far as I know, this might be the first ISO standard that fully implements just a single product of such horrible complexity (running over 6000 pages). It costs MS themselves an estimated 150 work years to implement their own standard. However, this was later qualified by Andrew Shebanow after a response from Rick Schaut with a different set of statistics. But even after all numbers juggling, it is still not clear whether other groups can implement the exact same product, and if they can, how much time this will take. According to *How to hire Guillaume Portes* by Rob Weir, it is clear that Microsoft withholds essential information to fully implement EOOXML. For a more comprehensive comparison between EOOXML and ODF, see *ODF/OOXML technical white paper*.

'Rumours' have it that MS EOOXML is just a serialized, packaged memory dump of the internal Office data structures. As Rob Weir puts it:

The astute reader will notice that this is pretty much a bit-for-bit dump of the Windows SDK memory structure. In this case the file format specification provides no abstraction or generalization. It merely is a memory dump of a Windows data structure.

Bill Hilf has meanwhile confirmed these rumours as reported by the Open Malaysia blog.

A good standard does contain features that help converting documents from legacy products. But it does not require a reimplemention in the standard of all legacy formats. A good illustration how far removed EOOXML is from a real standard is given in the above mentioned *How to hire Guillaume Portes* by Rob Weir. A choice quote from Rob Weir, after reproducing the requirements for Word 95's spacing compatibility "between full-width East Asian characters in a document's content":

What should we make of that? Not only must an interoperable OOXML application support Word 12's style of spacing, but it must also support a different way of doing it in Word 95. And by the way, Microsoft is not going to tell you how it was done in Word 95,

even though they are the only ones in a position to do so.

This aspect of EOOXML is consistent with the fact that MS EOOXML seems to be a memory dump of Office internal data structures. It can be imagined that MS Office stores its own formatting information in internal data structures, but uses hooks into legacy code, bugs included, to generate older formats. Legacy formats Microsoft might not know how to recreate themselves anymore. So when dumping its internal data to file, it inserts these hooks into the XML to refer to these legacy code fragments. How anyone without these legacy code fragments could re-implement their behavior is beyond my comprehension. Maybe someone can enlighten me about this.

In his blog, Brian Jones answers some of the points of Rob Weir and accuses ODF from having unspecified elements too. But read the comments on his blog about what questions Brian does not answer (and never answers, see this GL post). Brian Jones seem to confuse unspecified formatting elements in EOOXML that affect the layout of the document with unspecified application internal settings, eg, menu bar placement, in ODF. It is clear that the latter are not intended to be portable. Moreover, Brian Jones seems to confuse OpenOffice.org with the ODF standard. For instance, when he complains that OpenOffice.org has a config setting indicating legacy line-spacing. But this config setting is definitely not part of the ODF standard. Rob Weir discusses the lack of distance between OOXML and MS Office 2007 in Essential and Accidental in Standards where he concludes:

It seems to me is that OOXML in fact does have application-dependent behaviors, but only for Microsoft Office, and that Microsoft has hard-coded these application-dependent behaviors into the XML schema, without tolerance or allowance for any other implementations settings.

Something does not cease to be application-dependent just because you write it down. It ceases to be application-dependent only when you generalize it and accommodate the needs of more than one application.

The inclusion of application config settings into the

document standard on an equal footing strengthens the picture that projects EOOXML as a semi-automatic dump of the internal data structures of MS Office 2007. (on a personal note, it find it revealing that a very experienced MS developer like Brian Jones confuses a standard with the config options of an application)

In short, EOOXML contains a lot of distinct legacy formats. This point is made very clearly in another of Rob Weir's blog posts Calling Captain Kirk:

The OOXML specification, at 6,000+ pages has now just sucked in the complexity of one or more versions of HTML, MHTML, RTF and WordProcessingML. It requires that a conformant application understand these formats, but forbids a conformant application from producing them.

This is another example of how you never know what you're getting when you get an OOXML file. To support OOXML is not to support a single format, or even a single family of formats. To fully support OOXML requires that you support OOXML plus a motley hodgepodge of various other formats, deprecated, abandoned and proprietary. The cost of compatibility with billions of legacy Microsoft documents is that you must support their legacy of years of false starts and restarts in the file format arena.

Also Andy Updegrave's blog post The Contradictory State of OOXML refers to these proprietary legacy components in EOOXML:

Other parts of OOXML refer to OLE, macros/scripts, encryption and DRM \u2013 none of which are fully described. Nor has Microsoft stated whether necessary information will be supplied on a non-discriminatory basis to all (or at all).

Stephane Rodriguess explains in a comment to Open Malaysia how the OLE in MS EOOXML is platform bound

There is a reason why Microsoft does not document this stuff. They would have to give the documentation of OLE, which in turn would show clearly as in water that this stuff is platform-dependent : Windows.

At some point, MS started to drum up "Representation" as the basic value of MS EOOXML, see Rob Weir's No

representation without specification. This representation thing can be summarized as EOOXML is like a street directory without a map. It represents each address, but won't help you to find it.

At this point, I am starting to seriously doubt whether even Microsoft could reimplement EOOXML from scratch."

Sick sense of humor? Visit Yahoo! TV's Comedy with an Edge to see what's on, when.
<http://tv.yahoo.com/collections/222>

From: [Howard](#)
To: [Standards \(ITD\);](#)
CC: ["Robert Gonzales";](#)
Subject: Open XML Policy Comment
Date: Thursday, July 12, 2007 3:31:29 PM
Attachments:

Technology policies developed by governmental agencies need to allow each agency to choose which technologies and

products that meet their needs. Accepting the Open XML standard will enable wider choices for each group and will spur competition and innovation.

Howard L. Scott, CSE/SMB
CPS Electronics & Consulting
Irvine, CA 92620
www.cpselectronics.com

714/573-1003 ph
Toll Free: 888-277-3532
714/573-7502 fax

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From: [Sean Lee](#)
To: [Standards \(ITD\);](#)
CC: [rgonzales at revonet.com; jakeseo at wilshirebank.com; "Wesley Won - MIS"; "Thomas Kim";](#)
Subject: Please Open XML
Date: Thursday, July 12, 2007 2:42:09 PM
Attachments: [image001.jpg](#)
[image002.gif](#)

Dear Sirs,

My name is Sean Lee, CEO of Bankinfra Technology Inc. who provides financial institutions in United States with various application software related to regulatory compliance such as Anti-Money Laundering Act and FASB. Regarding the proposed new policy to allow government agencies to use Ecma 376 – OpenXML file formats by The Commonwealth of Massachusetts, I would like to express my strong support for this proposal. Open XML meets all state requirements as an open standard and use of the format will help enable citizens and state agencies to access electronic files well into the future. I see all my colleagues and clients are sharing this opinion with me because Open XML provides us with easier integration, safe document handling, compact file format, and good compatibility with billions of documents.

I strongly believe and hope my support in this proposal will help all the people in the world. Thank you very much for your consideration.

Sincerely,

=====

Bankinfra
TECHNOLOGY, INC. SINCE 2002

Sean Lee
Bankinfra Technology, Inc.

3960 Wilshire Blvd. # 200
Los Angeles, CA 90010
Tel: (213)739-7900
Direct: (213)494-6162

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From: [Pepoli, Bethann \(ITD\)](#)
To: [Standards \(ITD\);](#)
CC:
Subject: FW: Constituent's public comment on Open Document Standards from Rep. Patricia Walrath's office
Date: Wednesday, July 11, 2007 4:48:33 PM
Attachments:

From: Peterman, Elaine (HOU)
Sent: Wednesday, July 11, 2007 1:42 PM
To: Pepoli, Bethann (ITD)
Subject: Constituent's public comment on Open Document Standards from Rep. Patricia Walrath's office

Bethann Pepoli, Acting CIO, Information Technology Division

Representative Walrath has asked that this e-mail from one of her constituents be forwarded to you as public comment on open document standards. Please let us know if you need further information.

Sincerely,

Elaine Peterman
Legislative Aide to
Representative Patricia A. Walrath
Room 236 - State House
Boston, MA 02133
617-722-2430

-----Original Message-----

From: Greg Troxel [<mailto:gdt@work.lexort.com>]

Sent: Tuesday, July 03, 2007 10:48 AM

To: Walrath, Patricia - Rep. (HOU)

Cc: Greg Troxel

Subject: document format use by the state

I just noticed this:

http://www.boston.com/business/technology/articles/2007/07/03/state_will_keep_office_after_microsoft_makes_change_in_software/

I realize this is a complicated situation, but as a citizen and taxpayer I've long been offended that the use of Microsoft software is needed to read documents posted on government sites (and to present at town meeting in Stow). The Open Document formats as used by OpenOffice appear to be a truly open standard, as opposed to one that is just barely adequately open to avoid unfavorable decisions.

I would suggest that the state, when deciding on formats, should not only insist on an openly documented format with no royalties required to use it, but also multiple independent interoperable implementations that run on multiple operating systems, so that different products could be used to edit and display documents. It's too easy for there to be a standard but then have Microsoft's implementation behave slightly differently, thereby defining the real standard. So far I've heard nothing that makes me think that Microsoft's "Open XML" meets these tests, and there's been a long history of difficult dealing with their formats.

Further, it doesn't seem reasonable for the state to continue to spend tax money buying office software from Microsoft when free alternatives exist. Certainly there is some transition pain, but it's quite mild (openoffice reads .doc reasonably well, and has a similar user interface) and the net present value of future licenses is huge.

Perhaps this is a separable issue from the determining the list of acceptable formats.

Greg Troxel

68 Harvard Road

Stow, MA 01775

From: [Mark Souza](#)
To: [standards at state.ma.us;](mailto:standards@state.ma.us)
CC:
Subject: Open XML Office Format
Date: Wednesday, July 11, 2007 3:36:11 PM
Attachments:

I support your recent policy on open XML office format. This is what I use and all my business associates.

Mark Souza

From: [Ignacio Carrera](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Public Comment on ETRM Draft 4.0
Date: Wednesday, July 11, 2007 1:21:43 PM
Attachments:

Dear Ms. Pepoli,

first of all, I'd like to express my gratitude to the State of Mass. ITD for its forward-thinking actions during the last two years and for standing the vastly underdeserved consequences their leaders had to endure.

Being a foreigner, I can tell you that its impact is not geographically limited, but brings a change at a global level. In that sense, I consider I can offer you my comments on the ongoing ETRM Draft version 4.0.

The ITD's decision brought many opportunities to discuss and raise awareness about the need to preserve public documents (at the very least), and mainly the threat represented by a status-quo-backed monopoly in the office documents arena.

Particularly my comment is about v4's inclusion of OOXML as a good-enough "standard". Even if it's true that, since the ITD released the last version two years ago, OOXML has improved a lot in terms of "openness", I like to think about that as a non-compromise issue: either you are or you are not (open). The reason being, that paying lip service to "openness" while ensuring that no one can fairly enter the marketplace (as opposed to some puppets newcomers --all of them arranged by Microsoft-- with the lowest-possible offering in order for them to represent no danger, as the case of the new translators) and play in a level field gives us absolutely no worth at all. Either we have an innovative, rich marketplace, or we keep the same stuff we have right now. There's no middle-ground, because the change of one evil to the next means a lot of rework, because, right now, and thanks to the many sleepless nights of many developers, we *can* access the binary formats.

If, in the fight for vendor independence (which is the first obstacle to the goals put forward by the ITD in 2005), we end up allowing a fake standard, then it will be far more difficult for us to get to the same compatibility status we enjoy right now with binary formats (which is not enough, and that's why we're all going through all this trouble to begin with).

If we are bringing new formats on the table, we must assure that anyone is freely

allowed, and *encouraged*, to implement them, in order to provide *real* innovation. That's what standards are meant to be. A restricted standard is a negative worth, we are far better without it.

Furthermore, considering everything that the ITD has achieved by standing firmly in what it considered "open" (let me suggest, we should start using "free", but that's easy to misrepresent), I encourage you, and everyone concerned, to not fold to pressure. Only by standing firm in its beliefs will the ITD achieve its original goals. Everything OOXML has turned out to be in these two years is merit of the ITD. It is now, "relatively open", not thanks to Microsoft, but in spite of Microsoft's own agenda. It is purely the merit of the Massachusetts ITD. It is therefore no time for lowering standards.

Let me finish by referring to Andrew Updegrove's blog, and [comments to ETRMv4](#) in particular for a clearer, more refined and detailed view of a position I share with him.

I look forward with hope (and excuse me for my English as it is not my native tongue),

Ignacio Carrera

From: [Mendel Cooper](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Opposed to proprietary "OpenXML" standard
Date: Wednesday, July 11, 2007 10:11:41 AM
Attachments:

Massachusetts's adoption of the misnamed Microsoft-proprietary "Open XML" standard is clearly the result of influence by lobbyists. It is not in the interests of the public or the state of Massachusetts.

Microsoft controls the Open XML protocol and it is not, in fact, a public standard in the conventional sense.

Mendel Cooper
author

From: [Jesse Stence](#)
To: [Standards \(ITD\);](#)
CC:
Subject: XML
Date: Tuesday, July 10, 2007 11:42:16 PM
Attachments:

Dear Sir:

Please know that we support open XML. Thanks, Jesse Stence

Get the free Yahoo! toolbar and rest assured with the added security of spyware protection.
<http://new.toolbar.yahoo.com/toolbar/features/norton/index.php>

From: [EDLECAM at aol.com](mailto:EDLECAM@aol.com)
To: [Standards \(ITD\);](#)
CC:
Subject: New File
Date: Tuesday, July 10, 2007 8:29:29 PM
Attachments:

We support the new file format.

See what's free at AOL.com.

From: [Edward Lurey](#)
To: [Standards \(ITD\);](#)
CC:
Subject: support xml
Date: Tuesday, July 10, 2007 6:55:56 PM
Attachments:

support Micro..

e

From: [Chet Webster](#)
To: [Standards \(ITD\);](#)
CC:
Subject: I support Open XML standard - you should too please
Date: Tuesday, July 10, 2007 6:37:08 PM
Attachments:

You should approve it as a standard for our State. Yes, your new policy to allow government agencies to use Ecma 376 is good.

Chet Webster
Brent Road
Lexington, MA

Registered voter, of age and with an opinion!

From: [Anderson, Ken](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open XML
Date: Tuesday, July 10, 2007 5:34:29 PM
Attachments:

I support Open XML.

Ken Anderson, CEO
Anderson & Associates, Inc.
100 Ardmore St.
Blacksburg, VA 24060
540 552 5592
800 763 5596
www.andassoc.com
anderson at andassoc.com

From: [DONALD & CONNIE LeBLANC](#)
To: [Standards \(ITD\);](#)
CC:
Subject: "Open XML"
Date: Tuesday, July 10, 2007 4:45:58 PM
Attachments:

To whom it may concern,

It is comforting to read that Massachusetts is considering the use of open xml. This standard that is excepted internationally allows for the selection of that which serves any of it's users best. It is wise to have the ability in this age of globalization to communicate with all parties. Once again Massachusetts will be marking a path for others to follow.

Congratulations for such a wise move!

Donald LeBlanc, San Antonio, TX

From: [Mary Shen](#)
To: [Standards \(ITD\);](#)
CC:
Subject: open XML
Date: Tuesday, July 10, 2007 4:39:47 PM
Attachments:

We support open XML.

From: [Cowlitz Fritz](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Support OpenXML
Date: Tuesday, July 10, 2007 4:36:47 PM
Attachments:

As a business person, database engineer and a past government employee, I urge you to adopt Ecma 376 - Office Open XML File Formats ("Open XML").

David James Fritz
417 Moilanen Dr.
Longview, Cowlitz Co., Washington
98632

From: [Kevin Quiggle](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Public Comment on ETRM Draft 4.0
Date: Tuesday, July 10, 2007 4:05:02 PM
Attachments: [comment-etrm-draft-4-odf.pdf](#)

Please see my comments attached, as well as listed below for your convenience:

July 10, 2007

Information Technology Division
Commonwealth of Massachusetts
Attention: Beth Ann Pepoli

Re: Public Comment on ETRM Draft 4.0 -
A Call to Reject Ecma 376

Dear Ms. Pepoli:

I would like to preface this letter by noting that while I am the General Manager of Information Systems for the Detroit Water and Sewerage Department¹, the opinions in this letter are my own, and are not intended to represent DWSD in any way. However, I do think that my background illustrates why issues relevant to ETRM Draft 4.0 are very much relevant to DWSD operations, and are of concern to me as an IT professional.

With respect to ETRM Draft 4.0, I would like to begin my comments by noting the exemplary contribution the ITD has made to the discussion on open formats, to defining the public interest in open document formats, and the risk inherent in electronic documents based upon proprietary formats. It is therefore with some dismay that I view ETRM Draft 4.0 as a retreat from the sound principles initially laid out by the ITD.

The initial position of the ITD – support for open document formats which are not controlled by a single vendor, should be maintained. Ecma 376 is a retreat from this standard, and is not consistent with the core

principles which open document formats are intended to support. This is by no means intended to be an anti-Microsoft position (nor do I view the initial ITD position as such). Rather, it is a recognition that the goals and needs originally established cannot be accomplished when any one vendor is granted “favored status” by their ability to create and promulgate a “captive standard” such as Ecma 376.

True open standards will promote real competition and innovation, and will therefore best serve the citizens of Massachusetts, as well as other governmental entities and businesses. I urge the ITD to hold to its principles, and to refuse to include Ecma 376 on its approved list.

Sincerely yours,

Kevin Quiggle

From: [wallace mahoney](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open XML
Date: Tuesday, July 10, 2007 3:51:54 PM
Attachments:

Makes sense to me...

From: [Zephan Schroeder](#)
To: [standards at state.ma.us;](#)
CC:
Subject: FOR Open XML standard adoption
Date: Tuesday, July 10, 2007 3:37:41 PM
Attachments:

Dear Massachusetts Information Technology Division,

I'm glad to hear you are seriously considering adopting the Open XML standard. I think the additional flexibility and open functionality will benefit Massachusetts and any other governments that follow. For government I am glad to see that an open (non-proprietary) document standard is adopted so that there is no dependence on any individual company (Microsoft included).

Why do I care (and why am I writing this)?

1. I strongly support governments using new and existing technology to help people. (That's my personal lifelong goal as well.)
2. Clear adoption of standards clarifies how to store data and makes it more accessible in the long run.
3. Leadership helps other governments and organizations learn and follow positive technology showcases.

Yes, I work for Microsoft (per my e-mail alias). However that is not why I am writing nor the reason I support your effort. With an open standard Microsoft competes with any other company or even internal government tools/development to provide best software that enables the greatest return (to the people you serve) on government (taxpayers) investment.

Thanks! - ~~Zephan Schroeder~~

From: [ELCEL at aol.com](mailto:ELCEL@aol.com)
To: [Standards \(ITD\);](#)
CC:
Subject: support OPEN XML
Date: Tuesday, July 10, 2007 3:31:09 PM
Attachments:

See what's free at AOL.com.

From: [R Deans](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Microsoft's OOXML format
Date: Tuesday, July 10, 2007 10:36:55 AM
Attachments:

"International standards" should not be defined by a single monopoly in Redmond, WA

1. There is *already a standard ISO26300 named Open Document Format (ODF)*: a dual standard adds costs, uncertainty and confusion to industry, government and citizens;
2. There is *no provable implementation of the OOXML specification*: Microsoft Office 2007 produces a special version of OOXML, not a file format which complies with the OOXML specification;
3. There is *missing information from the specification* document, for example how to do a *autoSpaceLikeWord95* or *useWord97LineBreakRules*;
4. More than *10% of the examples mentioned in the proposed standard do not validate* as XML;
5. There is *no guarantee that anybody can write a software* that fully or partially implements the OOXML specification *without being liable to patent damages or patent license fees by Microsoft*;
6. This *standard proposal conflicts with other ISO standards*, such as ISO 8601 (Representation of dates and times), ISO 639 (Codes for the Representation of Names and Languages) or ISO/IEC 10118-3 (cryptographic hash);
7. There is *a bug in the spreadsheet file format which forbids to enter any date before the year 1900*: such bugs affects the OOXML specification as well as software versions such as Microsoft Excel 2000, XP, 2003 or 2007.
8. This *standard proposal has not been created by bringing together the experience and expertise of all interested parties* (such as the producers, sellers, buyers, users and regulators), but by Microsoft alone.

Robt Deans
No. Easton, MA

Outgoing mail is Virus Scanned by Norman Data Defense. Inbound Spam reduced
98.2% by Vircom Sieve.

From: [ITDWeb](#)
To: [standards at state.ma.us](mailto:standards@state.ma.us);
CC: [McKay, Valerie \(ITD\)](#);
Subject: FW: ITD Website Feedback
Date: Tuesday, July 10, 2007 7:39:01 AM
Attachments:

Paula Scudieri
Mass.Gov Office
617-626-4508

-----Original Message-----

From: apache at w1.mass.gov [[mailto:apache at w1.mass.gov](mailto:apache@w1.mass.gov)] On Behalf Of Work, Web (ITD)
Sent: Monday, July 09, 2007 9:47 AM
To: ITDWeb (ITD)
Subject: ITD Website Feedback

This Request was generated at: Mon Jul 9 09:47:18 EDT 2007

Visitor Contact Info

Name : Updated 07-09-2007 - ETRM v. 4.0 comment for review (please forward to the department who is reviewing comments)

Email : MSoutlookyourunisvulnerable at sonoemailduetospanthankyou.com

Phone : Again, There is no way to send in comments by USPO at all? Just email? Where is the webform? Why RTF format on ETRM v.4.0 document web post?

Subject : ETRM v. 4.0 web page (lacks postal mail address for comments - so please forward this one, thank you!

Comments : Attn: ITD ETRM v.4.0 comment review group and all ITD employees...

Please forward this ammendment and update of the ETRMv.4.0 comment to all that work at the Commonwealth's ITD, who are still interested the "soverign" state of the Commonwealth's data processing status.

Below is a comment that explains how ETRM v.4.0 is a step toward a non-reversible Microsoft Lock-in future.

NOT to the benefit of the citizens of the Commonwealth of Massachusetts, but instead only of benefit to Microsoft.

The ETRM v.4.0 change to include an "non-Free" Microsoft ONLY "Ecma 376 - Office Open XML Formats (Open XML) vs using JUST the Open Document Format (ODF) ISO standard is mind boggling.

This decision to support the introduction of a Microsoft owned and controlled format into ETRM v.4.0, is understandable only in the context where it seems that politics has somehow influenced this decision (resulting in an inclusion of a MS lock-in technology, that is widely seen in IT as a technology that only Microsoft has control over)!

What is best for the next 200 years? Not a format that is only controlled by ONE COMPANY.

It appears that the ITD is now concerned about Microsoft and the Microsoft political funding machine over the public interest and the budget funding tax-payers for the next 200 years!

The OASIS (ODF) is a free and patent free format.

Microsoft marketing named the "Office Open XML Formats (Open XML)" to sound "open" but it is anything but open. For example: Microsoft will not allow the format to be ruled by a truly independent standards body (vs ODF or Open Document Format that is ruled by an open to all OASIS ruling body).

Microsoft is the sole owner and controller of patents and copyrights for the Office Open XML Formats (Open XML) and has retained control and ownership of those patents and copyrights!

The OASIS Open Document Format ISO standard is a patent free Standard (SUN Microsystems and others have released the patents to be freely used by all with no threats.

Sun Microsystems is also licensing JAVA under the GPL (IBM released all their interest in the Eclipse project to an independent body and now that Sun is freeing JAVA the Eclipse Foundation is freely working with SUN and JAVA)

SUN has also announced that they are going to be looking at licensing their Solaris UNIX Operating System under the NEW GPLv3 license... all very good for users who wish to control their destiny! This is also very good for governments who wish to

maintain their sovereignty for the next 200 years vs being ruled in effect by Microsoft (as Microsoft, by owning and having sole control of it's formats, can then force everyone to change to their next format, and discontinue support for older formats, at will)! For Microsoft this has a benefit, and that one purpose maintains the existence of Microsoft's market share as a goal (and serves only to generate income and force consumers to buy yet another Word processor, Spread Sheet or Office Suite for Microsoft's economic benefit alone).

If Microsoft were to announce and free all patents and technologies in their format for everyone else (including the Free and Open Source Communities) to use freely, then the Microsoft Office Open XML Formats (Open XML) or "Not Open XML format" would then be free and open...! Today the Microsoft invented and patented Office Open XML Format (Open XML) is NOT OPEN... but, Microsoft's marketing dept would like you to think it is.

Is Mass going to be taken in by Microsoft's marketing department... to the disadvantage of the tax payers of the commonwealth?

Mass should look the Microsoft Office Open XML Formats (Open XML) and understand that Microsoft's Office Open XML Formats (Open XML), is only a 1/2 step to a true XML format (this is due to needing a migration bridge between the many legacy MS formats that we have had to migrate to in the past at a very expensive dollar cost, and the new one Microsoft).

As a result you can bet that in the next 4 years that Microsoft will have to come up with a true XML format that to replace it... Does Mass. want to absorb that Migration cost?

Here is a history of the Microsoft standards activity (and lack of activity):

http://www.grokdoc.net/index.php/Dirty_Tricks_history

When you examine this history in a interview regular participants that have attended many standards meeting over the past 10 years you will learn that Microsoft attended many meetings until the end of the 1990s when they stopped attending the meetings and adopted a strategy to create their own "MICRSOFT OWNED" standards that were put in place by their MONOPOLY position and then they kept the technology a secret keeping out any competitor from using the technology.

Is being locked-in to a Microsoft controled format for the distant future, something at the Commonwealth wants? If so, then who has be paid money under the table from Microsoft for such a stupid direction?

Or, is the Commonwealth interested in truely open formats, like the OASIS Open Document Format, that are free for all to use for the next 200 years?

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SD: (laughter) Well, I guess I'm one of these people who just kind of sees, you know, OOXML on one side and ODF on the other side and a trench in the middle.

"Georg Greve: That is a way in which this situation has been seen. That is certainly true. The problem here is, there is an obvious connection in the sense of MS-OOXML trying to do the same thing, the same functionality that ODF is supplying, meaning a universal office document format, but trying it the Microsoft way, which means ultimately trying to subvert the open standard by a proprietary protocol that is in the hands of Microsoft so that Microsoft can then kill off competition in this market entirely and dictate the market totally. That is the obvious strategic goal behind OOXML. In fact, I spoke about this in an article of the "Danaergeschenk" that was published on Groklaw towards the end of last year if I remember correctly, where I spoke about the fact that Novell was working on a "fig-leaf" implementation of an OOXML plugin, if you will, so that you could claim to have some interoperability, but when people tried this out, they found naturally that this interoperability was extremely limited and in fact, it didn't seem to work at all. It's just there on paper, so it looks like there is another implementation, but that's really all it is. It's a fig leaf, nothing else.

Now, OOXML was accepted by ECMA as an ECMA standard, although from the recent answers published by ECMA on questions that have been raised about OOXML it seems that they themselves didn't quite understand what they were doing. I mean, some of the most fundamental questions, in particular the one about the legal safety which is one of the six ones that I've written up and posted on our webpage -- they have no idea how that works. They actually cannot say -- and rely purely on vague Microsoft promises that the legal security is there. But once you look at those promises, it becomes very apparent that this is not enough to actually be able to implement OOXML. There is this Microsoft Open Specification Promise that they put on their webpage.

Which is natural, because this is a proprietary format. It's nothing else.

There were a couple of other questions, too. I mean, I really recommend to everybody to have a look at those six questions which were phrased in a way to give, on two sheets A4, an idea to everybody who's interested in this, of what's wrong with OOXML, where is the problem, why is this a problem. So I would encourage everybody to have a look at this, spread it, to journalists, to politicians, and to the national standardization bodies. Contact your local national standardization body, find out who's on the committee for that decision whether or not to approve OOXML as an ISO standard and give them these six

questions. Ask them to answer them. Ask them to find answers for them and ultimately, they will themselves then see why they have to say no to OOXML. Because I have not yet seen any good answers to any of these questions.

And Microsoft has tried, but usually, that takes the form of trying to distract from the issue, trying to weasel around the actual problem, or frankly outright ignoring what was the question. So those six questions I believe could be a very useful resource for everyone around the world who wants to do something about this, which is why we put them out in this way. They come as an HTML page as well as a PDF that you can print and just hand out. And I would ask you to do so, and do so fast because that decision is upcoming soon.

[36:28]

SD: Now, Microsoft must have been pleased with the results they've had so far by using ECMA as a fast-track entry to the ISO, because they just last week also submitted their so-called "PDF killer" format, the XML Paper Specification I believe it's called. Is this a case of "Here we go again"?

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Georg Greve: It appears that way. It's unfortunate, but it appears that Microsoft has found a severe weakness in the ISO standardization process that they can exploit, which is that you have lots of technical bodies around the world in which Microsoft is usually present and has significant influence who are not really operating on the grounds of what needs to be an open standard in the sense of the full necessity of openness to achieve actual interoperability. So there is a lot of wiggle room and gray areas around this, and the only arguments that Microsoft wants those bodies to look at are technical arguments. Now, technical arguments are important, but sometimes Microsoft tries to portray, for instance, legal issues as nontechnical arguments, as general arguments which should not influence the decision of those national standards bodies, which is wrong, because ultimately it defeats the entire purpose of those bodies. Because the purpose of those bodies is, in the end, to have a standard that allows competition.

Competition is something that happens on the base of a common standard. Microsoft is putting forth this notion that there should be competition on the standard in the sense of between the standards, but that is an entirely nonsensical notion, and it's very key to understand that, because if you look at any other area, there is never additional competition from additional proposed standards. You can start with a very simple example, for instance, power plugs. It doesn't help competition to have more than one standard for a power plug. In fact, the only thing it causes is annoyance, because we always have to think about which converters we need.

[38:54]

SD: Well, there's the form factor, there's the voltage --

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Georg Greve: There's various factors, actually. And now think about the complexity that an office format has in comparison to a power plug. A power plug is unbelievably simple in comparison. But, still, some similar things apply, and now if you imagine a world in which in your country, every electricity company had their own socket format and could then license the plug format only to certain vendors of certain devices, and those would be the only ones you could buy from because you happen to have those plugs in your house. That this helps competition is an obviously nonsensical notion, because the best competition is achieved if everybody uses the same plugs and the same sockets, because then you can buy electricity from any electricity company and you can buy devices from any devices company. Appliances you can get from one side and electricity from another. Now, Microsoft tries to be both. They try to be the electricity and the appliances company at the same time, and creating plugs for which only they have the sockets and vice versa. That this is in some way helpful to competition -- I don't think how anybody could actually honestly believe that".

<http://yama.blogsome.com/2007/07/04/four-legs-good-two-legs-bad/>

"4 July, 2007

Four legs good, two legs bad!

Filed under: FLOSS, Microsoft, Open standards, Software, Politics, Media, Social issues

George Orwell's classic allegory, Animal Farm, presents many perspectives on human behaviour and society. One of these is how people can be led and manipulated through the control of information. In the story, the Seven Commandments formed a de facto constitution for the Animalistic society. Since only a handful of animals could read, the rest were dependent upon what they were told was written. Gradually, the writing was cunningly altered to the benefit of the pigs above all other animals, and the populace was taught to not trust their recollections of what was written in the past.

What made this subversion possible was the inability of most animals to read. The two animals that could read (aside from the pigs) chose not to do anything about what they saw. Amongst other things, the right to access and read information is an important cornerstone of democracy.

This is where open file formats come in. As our lives become increasingly defined by electronic records, there needs to be a way for independent viewing and auditing. Paper is easily read, but computer files require software to decypher them. Imagine if you needed special (and expensive) glasses just to read the letter that you yourself wrote only a few years ago.

There has been a fair amount of discussion in the press regarding the OpenDocument and the so-called "Open" XML formats. The primary focus of this reporting thus far has been on the political and technical facets. This is slowly changing, as the importance of long-term data preservation and freedom of information become apparent to ordinary folk.

The BBC has published a report on the problem, and discusses how the UK National Archives are attempting to deal with it. Alas, it appears that they have opted for a short-sighted approach, relying on virtualisation of older operating systems and applications, through a direct partnership with Microsoft. With this approach, the format decoders/viewers (not to mention the operating system and software performing the virtualisation itself) remain closed in source and specification, and one must deal with a cumbersome virtual machine just to view a document.

Where is the guarantee that files can be read hundreds of years from now, just as we can do today with paper documents such as the historic Magna Carta? How does this partnership benefit me, an ordinary citizen who might wish to view ten- (or even two-) year-old public documents that are only available in a proprietary electronic format?

It's both sad and frustrating to see that history is yet again repeating itself. Whilst the contents of the Domesday Book can still be read nearly 1000 years after completion, the digital BBC Domesday Project was rendered virtually unreadable a mere 16 years later. [g video] at this year's linux.conf.au about this technology, known as Xena [PDF]. Whilst their UK counterparts seem to have forgotten that access to data is not just a privilege for those able to make exclusive agreements with purveyors of lock-in technologies, the Australian National Archives have been striving to ensure that nobody is left out of the digital revolution.

Four legs good, two legs better? Let's prevent this subversion from happening".

Please Read <http://www.groklaw.net> for the facts, & nothing but the facts.

From: [Asko Tontti](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Comments on ETRM draft 4.0
Date: Monday, July 09, 2007 6:39:39 PM
Attachments:

To: Information Technology Division, Massachusetts, Beth Ann Pepoli

Your work on ETRM is widely followed around the world. It has had profound impact on opening people's eyes what open and real standards mean and what possibilities they open.

OASIS' ODF offers people, and programmers new possibilities that we have earlier seen in the realm of World Wide Web (WWW), but only if ODF comes widely supported standard. You can be the force that helps ODF to gain that position.

Microsoft's OOXML is too complex, large and ambiguous. I cannot imagine there could be multiple good and extensive implementations of OOXML. Without the multiple implementations there cannot be new and innovative products and services that challenges the current world, like the WWW has done and is still doing. And without those multiple implementation OOXML cannot really be a real standard.

I consider it good thing that OOXML is now openly specified via ECMA but MS has previously withdrawn from public working groups and standardization bodies when MS considers its market position to be protected. For example MS opened its own secret version of CIFS (Common "Internet" File System) for others via Internet Society's Internet Engineering Task Force (IETF, <http://www.ietf.org/>) but later closed it and made it incompatible with the implementations of others. There are other examples of this.

I recommend that you also read the following document about OOXML and standards.

<http://www.nooxml.org/local--files/arguments/TheCaseAgainstOOXML.pdf>

I hope you carefully consider the implications of supporting OOXML as if it would be an open and real standard like ODF.

With regards,

Asko Tontti

--

"Who watches the watchers?" -- Decimus Iunius Iuvenalis

From: [John Myshrall](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Please Consider The Use ODF
Date: Monday, July 09, 2007 6:25:27 PM
Attachments:

I am not a US citizen (Big Time Patriots Fan Though) however I was very proud to see your state become the Maverick and set the new bar. I was disappointed to see a reversion to the EMCA non-Standard.

By utilizing the proprietary MS format you are supporting a non open standard. Is this the best thing for your citizens because you now and forever will have vendor tie in ? With ODF you have the control not the vendor.

True standards are open and free to use. The one you are considering is not. Don't let Microsoft blind you. Change is tough but if it is for the better then it will be well worth it.

I'm only a Canadian and have no impact on what your state does, but consider what if ? Your state can be the bar all are measured by. You could be doing the American people a great service.

Concerned Canadian

John Myshrall

From: [andrew.updegrove at gesmer.com](mailto:andrew.updegrove@gesmer.com)
To: [Standards \(ITD\);](#)
CC: [Pepoli, Bethann \(ITD\);](#)
Subject: Comments on ETRM 4.0
Date: Monday, July 09, 2007 12:36:51 PM
Attachments: [ITD Comments 7-09-07.pdf](#)

Attached please find my comments tendered in response to the invitation for public comments on the Draft ETRM 4.0 posted by the ITD on July 2, 2007.

Andrew Updegrove

(See attached file: ITD Comments 7-09-07.pdf)

Any tax information or written tax advice contained herein (including any attachments) is not intended to be and cannot be used by any taxpayer for the purpose of avoiding tax penalties that may be imposed on the taxpayer. (The foregoing legend has been affixed pursuant to U.S. Treasury Regulations governing tax practice.)

Electronic mail from Gesmer Updegrove LLP, 40 Broad Street, Boston, MA 02109. Voice: (617) 350-6800, Fax: (617) 350-6878. This communication is intended only for the use of the individual or entity named as the addressee. It may contain information which is privileged and/or confidential under applicable law. If you are not the intended recipient or such recipient's employee or agent, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please immediately notify Christopher O'Sullivan at (617) 350-6800 and notify the sender by electronic mail. Please expunge this communication without making any copies. Thank you for your cooperation.

From: [Adams, Jeffrey](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Please do NOT use Microsoft OOXML!
Date: Monday, July 09, 2007 12:15:15 PM
Attachments:

Hello;

Please do NOT accept Microsoft's OOXML.
While Microsoft managed to push it through ECMA it is NOT a world class standard!

Also, based on Microsoft's past practices, this is only the usual smoke and mirrors they use. There have been documented articles that while OOXML may be a standard, you have to have a LICENSED Microsoft product to use all of its features. This is NOT an open standard.

Further, as a Commonwealth taxpayer, I can see the many millions of MY tax dollars spent on Microsoft's Office product much better spent on REAL needs of the taxpayers and use of either the free OpenOffice, or, significantly cheaper Sun Microsystems StarOffice (if you must have a commercial product).

Having used the OpenOffice product for well over 9 years so far, I have very rarely hit ANY of the issues I am sure Microsoft is trying to scare you with. In these past 9 years no one can tell the difference with any document authored, modified, saved by OpenOffice.

Do the RIGHT thing for a change! Save our taxpayer's money and use a TRUE,

OPEN,
standard!

Microsoft's OOXML IS NOT THAT STANDARD!!!

The ODL standard is the RIGHT standard.

Jeff

Jeff Adams

jhadams at verizon.net

From: [ITDWeb](#)
To: [standards at state.ma.us.;](#)
CC: [McKay, Valerie \(ITD\);](#)
Subject: FW: ITD Website Feedback
Date: Monday, July 09, 2007 7:48:29 AM
Attachments:

Paula Scudieri
Mass.Gov Office
617-626-4508

-----Original Message-----

From: apache at w1.mass.gov [<mailto:apache at w1.mass.gov>] On Behalf Of Work,
Web (ITD)
Sent: Friday, July 06, 2007 2:27 PM
To: ITDWeb (ITD)
Subject: ITD Website Feedback

This Request was generated at: Fri Jul 6 14:27:16 EDT 2007

Visitor Contact Info

Name : NEW - (extended) ETRM v. 4.0 comment for review (please forward
to the department who is reviewing comments)
Email : MSoutlookyourunisvulnerable at sonoemailduetospamthankyou.com
Phone : Again, There is no way to send in comments by USPO at all? Just
email?

Subject : ETRM v. 4.0 web page (lacks postal mail address for comments
- so please forward this one, thank you!

Comments : Attn: ITD ETRM v.4.0 comment review group and all ITD
employees...

Please forward to all that work at the Commonwealth's ITD, who are still
interested the "sovereign" state of the Commonwealth's data processing

status.

Below is a comment that explains how ETRM v.4.0 is a step toward a non-reversible Microsoft Lock-in future.

The ETRM v.4.0 change to include a "non-Free" Microsoft ONLY "Ecma 376 - Office Open XML Formats (Open XML) vs using JUST the Open Document Format (ODF) ISO standard is mind boggling.

This decision to support the introduction of a Microsoft owned and controlled format into ETRM v.4.0, is understandable only in the context where it seems that politics has somehow influenced this decision (resulting in an inclusion of a MS lock-in technology, that is widely seen in IT as a technology that only Microsoft has control over)!

What is best for the next 200 years? Not a format that is only controlled by ONE COMPANY.

It appears that the ITD is now concerned about Microsoft and the Microsoft political funding machine over the public interest and the budget funding tax-payers for the next 200 years!

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Now, the interesting part in that statement how they have a certain grant for what they call "Microsoft necessary claims" -- if you look up a little bit lower in the definition what that actually means, it is very explicit about meaning only the base components of whatever they're talking about and no referenced technologies and no extensions to those technologies. Which means that all the proprietary formats that are covered in OOXML and are referenced in OOXML are not part of that Open Specification Promise to begin with, and neither are all the proprietary extensions that you can put in there. That means that the whole spectrum of documents that could be built with OOXML can only be read by one company, and that company being Microsoft. Which is natural, because this is a proprietary format. It's nothing else.

ve a look at those six questions which were phrased in a way to give, on two sheets A4, an idea to everybody who's interested in this, of what's wrong with OOXML, where is the problem, why is this a problem. So I would encourage everybody to have a look at this, spread it, to journalists, to politicians, and to the national standardization bodies. Contact your local national standardization body, find out who's on the committee for that decision whether or not to approve OOXML as an ISO standard and give them these six questions. Ask them to answer them. Ask them to find answers for them and ultimately, they will themselves then see why they have to say no to OOXML. Because I have not yet seen any good answers to any of these questions.

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From: [B.J. Herbison](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ETRM v4.0 should not allow use of Ecma-376
Date: Monday, July 09, 2007 5:58:37 AM
Attachments:

The current draft of ETRM v4.0 would allow the use of Ecma-376 for documents. This is a big step backward as Ecma-376 will never be anything but a Microsoft-specific format only fully understood by Microsoft software.

The flowchart at the bottom of http://www.mass.gov/?pageID=itdterminal&L=3&L0=Home&L1=Policies%2c+Standards+%26+Guidance&L2=Drafts+for+Review&sid=Aitd&b=terminalcontent&f=policies_standards_etrmv4_etrmv4dot0intro&csid=Aitd entitled "Decision Process for Recommending a Standard/Specification as an Enterprise Standard" starts with the question "Is the standard fully documented and publicly available?".

Ecma-376 fails this test and should be disallowed for that reason. The file format is full of references to information that only Microsoft knows. For a description of some of the flaws, see: http://www.grokdoc.net/index.php/EOOXML_objections#Ecma_376_relies_on_undisclosed_information

Thanks,
B.J.

--

B.J. Herbison / bj at herbison.com / <http://www.herbison.com/herbison/bj.html>

The Next Asylum / 203 Long Hill Road / Bolton, MA 01740-1421 / +1 978 634-1061

From: [Brandon Stafford](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Opposed to inclusion of ECMA 376 in ETRM 4.0
Date: Sunday, July 08, 2007 11:52:46 PM
Attachments:

Hello,

I'm a long-term resident of Massachusetts; I run an engineering firm in Waltham. I have no affiliation with any company that produces any document format.

I have two objections to the inclusion of Microsoft's ECMA 376 in ETRM 4.0:

1. As a citizen, I don't want to buy a certain vendor's software to read government documents.
2. As a technical professional in a competitive market, I don't want to pay the overhead of upgrading the de facto standard Microsoft Office every 3 years for no good reason.

ITD had the right idea with its choice of ISO 26300 (ODF) as a single, open standard for government documents.

In the engineering work that I do, we need to maintain two sets of tools-- one in metric units and one in English units. The choice of two standards for the same function provides nothing but inefficiency. ITD should not introduce similar inefficiency into government document formats.

It is predictable that no other vendors will implement ECMA 376 well enough to guarantee document fidelity across platforms. To see why, consider this excerpt from page 1379 of ECMA 376:

"If this compatibility setting is turned on:

```
<w:compat>  
  <w:autoSpaceLikeWord95 />  
</w:compat>
```

Then applications should mimic the behavior of Microsoft Word 95 when

determining the space between those characters, as needed."

No explanation of "the behavior of Microsoft Word 95" is given. How might a competing vendor determine all the rules that Word 95 uses for character spacing? Type all possible sequences of characters in all fonts on a computer borrowed from the Computer History Museum, and then analyze the results?

This sort of incomplete specification, found throughout ECMA 376, will mean that nobody other than Microsoft will be able to implement ECMA 376 completely. While ECMA 376 is nominally open, in my judgment, it is so incomplete as to be effectively proprietary. In the language of ITD, ECMA 376 is publicly available, but not fully documented. The predictable result of ECMA 376 adoption will be a series of buggy import functions in competing software, while Microsoft Office remains the government-supported standard.

The same cannot be said for ODF. Many competing products that implement ODF already exist; I've been using them for all my personal documents for several years. I understand the objection that the switch to ODF from Microsoft's closed formats will be painful, but it's a better choice than upgrading to the next Microsoft format every three years for eternity.

I request that Massachusetts return to its innovative idea of choosing a single, open standard for government documents; I believe that ODF is the best choice for that standard.

Thanks for your consideration,
Brandon Stafford
14 Hews Street
Cambridge, MA

From: [jkefalas at COMCAST.NET](mailto:jkefalas@COMCAST.NET)
To: [Standards \(ITD\);](#)
CC: [jkefalas at COMCAST.NET;](mailto:jkefalas@COMCAST.NET)
Subject: review draft of ETRM v. 4.0
Date: Saturday, July 07, 2007 11:10:31 PM
Attachments:

I wanted to bring to your attention that Sun Sun has released their OpenDocument Format (ODF) plug-in for Microsoft Office 2000, XP and 2003. The plug-in allows Microsoft Office (for Windows) users to open ODF files and save their work in ODF formats used by OpenOffice, StarOffice, and other programs.

The plug in can be found:

<http://www.sun.com/software/star/openoffice/>

I hope that this information is helpful as ODF is the only recognized ISO standard. I know that you wanted to include Open XML but at this point in time it is premature. As ODF standard was the intent I wanted to make you aware that MS Office products with this add in does have the ability to use ODF.

Thank you for you attention,

John Kefalas

From: [Ofer Inbar](#)
To: [Standards \(ITD\);](#)
CC:
Subject: open document format
Date: Saturday, July 07, 2007 12:29:35 PM
Attachments:

I've been following Massachusetts' attempt to standardize on the Open Document Format for state information, since ... 2005, if I recall correctly. I am appalled at the influence of Microsoft in blocking this over and over. Most recently, I read that Microsoft's "Open XML" format has been added to the proposed set of acceptable open document formats. It is **not** open, it is a proprietary format that MS is using to try to kill off the real ODF.

Microsoft has the capability to write software that can read and write ODF files, just like any other software company or author. There is no need for us to cater specifically to Microsoft's marketing & product positioning whims by adopting their proprietary format that they own and can change at any time.

Please remove Microsoft's disingenuously-named "Open XML" from the list of acceptable document formats, and help us move to a state where public information is in a public format. Serve the public at large, not the special desires of an out of state software company.

Ofer Inbar, Cambridge, MA
-- Cos

From: [David McMicken](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ETRM and OOXML
Date: Friday, July 06, 2007 12:37:42 PM
Attachments:

Hi,

I've noticed that the new draft of the ETRM seeks to include Microsoft's OOXML as an additional standard. I strongly urge you to reconsider and omit OOXML since it is not a true standard.

Not only is the OOXML standard poorly defined and overly complex, but it is tied to one vendor which would require everyone to buy their products in order to access Commonwealth documents. Additionally, the definition of a "standard" should not be in the hands of a private entity since the temptation will always be there to alter it when they feel it is expedient. Please note that this has happened many times in the past with Office products.

I view a standard as something like the alphabet or ascii code; same for everyone that you can create what you want with it. Having the OOXML format as a standard would be like privatizing the alphabet and allowing a private entity to change letters as they see fit.

I assume what you're looking for is a standard with a stability and functionality that will allow people to access documents many years in the future. I don't feel that OOXML fits the task.

Thank you for your time.

Dave McMicken

From: [Neel Smith](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Ecma-376 Office Open XML File Formats
Date: Friday, July 06, 2007 11:39:57 AM
Attachments:

As a higher-education professional in Massachusetts, I rely on open standards in working with the digital information technologies at the center of my work, and my students' work. I'm deeply troubled by the proposed inclusion of Ecma-376 in the list of formats meeting the state's criteria for open document standards. The inclusion of a "covenant not to sue" while asserting proprietary patent rights calls the openness of this proposal into question. And it can hardly be called a "standard" when in many places it substitutes for a real specification an undefined reference to proprietary implementation of features in older Microsoft products.

I have 20 years of experience with semantic markup of documents (first with SGML, and over the past decade with XML), and I can also add that the XML in this format is very poorly conceived. Its organization mirrors the internal data structure of Microsoft's word processing software, at the expense of more readily reusable semantic schemes -- thus defeating the basic tenet of separation of semantic and presentational concerns that is central to the task of document markup.

In short, this "open" "XML" "standard" is questionably open, certainly not a standard, and poor XML.

By contrast, the existing ISO standard ISO/IEC 26300:2006 ("Open Document Format for Office Applications") is unencumbered by patent claims, fully specified in an ISO-approved standard without reference to proprietary implementations of any kind, and better suited to implementation in a wide variety of applications. As you are of course well aware, this standard has already been approved by the State.

Please reconsider unnecessarily proposing a format that falls so far

short of an open standard.

Neel Smith

Assoc. Professor

College of the Holy Cross

From: [Brian Johnson](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Standardized office document formats in Massachusetts under consideration
Date: Friday, July 06, 2007 10:06:35 AM
Attachments:

I read an article saying that Massachusetts is considering including OOXML in its list of acceptable document formats. As a Massachusetts resident, I would like to voice my opposition to this proposal.

I have no objection to any department within Massachusetts picking any one software suite over another - including the Microsoft Office packages, if that department feels that such a suite provides the best value for the dollars spent. However, I have read some of the comments by those analyzing OOXML, and I strongly believe that some aspects of that "standard" do not serve the goals that the state of Massachusetts had in mind when we started looking at document formats.

In particular, its strong use of undocumented, yet officially recognized binary formats within the standard effectively limit the ability of other vendors to fully meet the standard, effectively limiting Massachusetts to a single software package, and preventing departments from seeking the best value for the tax dollar. In addition, since those formats are both binary and undocumented, and using tags that are not in keeping with the normal XML tag readability, the goal of keeping these files readable over time (i.e, in the future when the original software is no longer available) is also unmet by the OOXML format.

As I already stated, with the current accepted standards (text, Open Document Format), etc, departments are free to find the best value for the dollar - including the Microsoft Office suite (since ODF plugins for office are becoming available.) However, I am concerned that the support of OOXML will undermine the goals that this state had and urge you to reject OOXML as an acceptable format for the state.

Thank you,

Brian D. Johnson

35 Robinhood Rd.
Natick, MA 01760

From: [Ilan Rabinovitch](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ETRM - ECMA-376
Date: Friday, July 06, 2007 9:24:06 AM
Attachments:

To whom it may concern,

I would like to express my objections regarding the inclusion of the Ecma-376 Office Open XML File Formats as an for use in MA state documents. Ecma-376 / Open XML is a poorly documented format which has not been fully implemented by a single vendor to date. If Microsoft, the creator of this format cannot fully it, how can you expect others to do so?

On the other hand, Oasis Document Format for Office Applications (ODF) has been implemented by a number of open-source and proprietary vendors. The format was developed by an open-standards body and has been accepted/approved by ISO and IEC as an international standard.

I urge you to reconsider your decision, and to refocus your efforts surrounding ODF and other truly open formats for use in government documents.

Sincerely,
Ilan Rabinovitch
818-442-1865

PO BOX 18351
Encino, CA 91416

From: [Ben Fitzpatrick](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ECMA 376, also known as Office Open XML
Date: Thursday, July 05, 2007 12:32:40 PM
Attachments:

To whom it may concern,

I have heard that the state of Massachusetts is considering allowing Microsoft's Office Open XML as an "open document" standard for use in governmental documents. While I don't have anything against Microsoft's Office suite, and indeed think it has some very powerful tools like Excel, I believe that the acceptance of this format as an open standard is misleading and incorrect.

The most thorough criticism (far more than I could put together) of this standard can be found at:

http://www.grokdoc.net/index.php/EOOXML_objections.

Via this document, you can learn that OOXML does not:

- * Represent the Gregorian Calendar correctly
- * Use standard ISO formats and behaviors, for example date representation, equation representation, and graphics representations. Instead, these use proprietary Microsoft implementations that have no specifications.
- * Specify some key components. For example, the standard indicates that "Line breaks are to be represented as Word 97 implemented them." There is no indication of how this is implemented. This could cause a failure in future years as no one would know how Word 97 encoded its line breaks, and thus data would be irretrievably lost.

Since there are quite a few key components not specified, allow me to list some of them.

- * English Metric Units (EMUs) are used. These are not defined. No one except Microsoft is able to implement them.
- * It references a microsoft-only document namespace (a namespace is a component of an XML file). This would not be accesible to outside

implementors.

- * The previously-mentioned Word97LineBreaks attribute
- * AutoSpaceLikeWord95 - Another Microsoft-only behavior
- * LineWrapLikeWord6
- * TruncateFontHightsLikeWP6

If I have not made myself sufficiently clear - Microsoft is the only one who can implement this standard. They have given no indication of what any of the components listed immediately above do. Therefore, this format cannot truly be open, because only one implementation is possible.

Please don't lock in government documents to this standard. I would like to be able to read them in 50 years.

Thank you,
Ben Fitzpatrick

--

::stop transmission::

From: [ITDWeb](#)
To: [Standards \(ITD\);](#)
CC: [McKay, Valerie \(ITD\);](#)
Subject: FW: ITD Website Feedback
Date: Thursday, July 05, 2007 10:44:23 AM
Attachments:

Paula Scudieri
Mass.Gov Office
617-626-4508

-----Original Message-----

From: apache at w4.mass.gov [<mailto:apache at w4.mass.gov>] On Behalf Of Work, Web (ITD)
Sent: Thursday, July 05, 2007 10:41 AM
To: ITDWeb (ITD)
Subject: ITD Website Feedback

This Request was generated at: Thu Jul 5 10:41:26 EDT 2007

Visitor Contact Info

Name : Re: ETRM v. 4.0 (please forward to the department who is reviewing comments)
Email : noemailduetospamandMSviruses at thank-youvery-much.com
Phone : There is no way to send in comments by USPO at all? Just email?

Subject : ETRM v. 4.0 web page (lacks postal mail address for comments)

Comments : Attn: ETRM v.4.0 comment review ITD department...

Below is a comment that explains how ETRM v.4.0 is a step toward a non-reversible Microsoft Lock-in future.

The ETRM v.4.0 change to include an "non-Free" Microsoft ONLY "Ecma 376 - Office Open XML Formats (Open XML) vs using JUST the Open Document

Format (ODF) ISO standard is mind boggling.

This decision to support the introduction of a Microsoft owned and controlled format into ETRM v.4.0, is understandable only in the context where it seems that politics has somehow influenced this decision (resulting in an inclusion of a MS lock-in technology, that is widely seen in IT as a technology that only Microsoft has control over)!

What is best for the next 200 years? Not a format that is only controlled by ONE COMPANY.

It appears that the ITD is now concerned about Microsoft and the Microsoft political funding machine over the public interest and the budget funding tax-payers for the next 200 years!

The OASIS (ODF) is a free and patent free format.

Microsoft marketing named the "Office Open XML Formats (Open XML)" to sound "open" but it is anything but open. For example: Microsoft will not allow the format to be ruled by a truly independent standards body (vs ODF or Open Document Format that is ruled by an open to all OASIS ruling body).

Microsoft is the sole owner and controller of patents and copyrights for the Office Open XML Formats (Open XML) and has retained control and ownership of those patents and copyrights!

The OASIS Open Document Format ISO standard is a patent free Standard (SUN Microsystems and others have released the patents to be freely used by all with no threats.

SUN Microsystems is also licensing JAVA under the GPL (IBM released all their interest in the Eclipse project to an independent body and now that SUN is freeing JAVA the Eclipse Foundation is freely working with SUN and JAVA)

SUN has also announced that they are going to be looking at licensing their Solaris UNIX Operating System under the NEW GPLv3 license... all very good for users who wish to control their destiny! This is also very good for governments who wish to maintain their sovereignty for the next 200 years vs being ruled in effect by Microsoft (as Microsoft, by owning and having sole control of its formats, can then force everyone

to change to their next format, and discontinue support for older formats, at will)! For Microsoft this has a benefit, and that one purpose maintains the existence of Microsoft's market share as a goal (and serves only to generate income and force consumers to buy yet another Word processor, Spread Sheet or Office Suite for Microsoft's economic benefit alone).

If Microsoft were to announce and free all patents and technologies in their format for everyone else (including the Free and Open Source Communities) to use freely, then the Microsoft Office Open XML Formats (Open XML) or "Not Open XML format" would then be free and open...! Today the Microsoft invented and patented Office Open XML Format (Open XML) is NOT OPEN... but, Microsoft's marketing dept would like you to think it is.

Is Mass going to be taken in by Microsoft's marketing department... to the disadvantage of the tax payers of the commonwealth?

Mass should look the Microsoft Office Open XML Formats (Open XML) and understand that Microsoft's Office Open XML Formats (Open XML), is only a 1/2 step to a true XML format (this is due to needing a migration bridge between the many legacy MS formats that we have had to migrate to in the past at a very expensive dollar cost, s and the new one Microsoft).

As a result you can bet that in the next 4 years that Microsoft will have to come up with a true XML format that to replace it... Does Mass. want to absorb that Migration cost?

Here is a history of the Microsoft standards activity (and lack of activity):

http://www.grokdoc.net/index.php/Dirty_Tricks_history

When you examine this history in a interview regular participants that have attended many standards meeting over the past 10 years you will learn that Microsoft attended many meetings until the end of the 1990s when they stopped attending the meetings and adopted a strategy to create their own "MICRSOFT OWNED" standards that were put in place by their MONOPOLY position and then they kept the technology a secret keeping out any competitor from using the technology.

Is being locked-in to a Microsoft controled format for the distant

future, something at the Commonwealth wants? If so, then who has be paid money under the table from Microsoft for such a stupid direction?

Or is the Commonwealth interested in truely open formats, like the OASIS Open Document Format, that are free for all to use for the next 200 years?

From: [Gary Rehorka](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Comments on review draft of ETRM v. 4.0
Date: Thursday, July 05, 2007 10:26:49 AM
Attachments:

I am writing to strongly oppose the inclusion of the Ecma-376 Office Open XML File Formats, along side of truly open and unencumbered formats, as an accepted format for Massachusetts state documents.

I cheered and applauded our Commonwealth's visionary action in leading the nation towards a future of openness which its courageous decision to require truly open formats for state documents. Unfortunately, the Massachusetts Information Technology Division has seen fit to cave to the pressure applied by Microsoft and has added its proprietary and encumbered Ecma-376 Office Open XML to the list of acceptable formats. This can be seen as nothing other than a retreat from a stance of support for truly open formats and a victory for the vested interests that support eliminating choice for the citizens of Massachusetts.

I also take exception over both the timing and duration of the comment period for such a major change to the Enterprise Technical Reference Model. To make such a change at the start of the busy summer season when so many are away and to limit the time that comments will be accepted to such a short window of time is a disservice to us all. These actions can do nothing but lend an air of back room dealings and collusion to this effort. I encourage you to greatly increase the period for comments and to make a greater effort to announce this major change in direction and your reasons behind it. This issue deserves to be fully examined under the light of day.

Sincerely,

Gary Rehorka
Shutesbury, MA

From: [Robert Kelly](#)
To: [Standards \(ITD\);](#)
CC:
Subject: OOXML as a standard for public documents
Date: Thursday, July 05, 2007 8:45:42 AM
Attachments:

I would suggest before approving OOXML as a format for public documents, that you look over the objections at <http://www.nooolxml.org/petition> as to why it should not be accepted as an ISO standard. If the idea is to ensure that your documents are available to all users, regardless of their choice of software platform (both OS and Office Suite) keep in mind that for ODF I can choose among MS Office with a 3rd party filter, OpenOffice, StarOffice, KOffice, Abiword, probably soon Gnumeric, etc. For OOXML, even MS Office doesn't actually implement the standard, and there is nothing else close to a working implementation of the standard. Even older versions of MS Office can't handle the format, and OpenOffice handles the old proprietary binary formats better than OOXML. For those of us who are committed the principle of Free ([as in freedom](#)) Software, there is no available option to deal with the files. For these reasons, please do not consider OOXML an acceptable alternative to ODF.

Thank you,
Robert Kelly III

From: [Tom Kreutz](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Your historic role in setting open document standards
Date: Wednesday, July 04, 2007 2:28:29 PM
Attachments:

Dear Sir/Madam,

Massachusetts played a pivotal role in the quest for freedom back in 1776. Please, please be cognizant of how important your role is in promoting internationally recognized, truly open document formats. The world is, literally, watching your decision. Please don't allow OOXML to be adopted (along with ODF) as an acceptable open document format.

Sincerely,

Tom Kreutz

Dr. Thomas G. Kreutz, Senior Technical Staff Member
Princeton Environmental Institute
Princeton University
25 Guyot Hall
Princeton, NJ 08544
Phone: (609) 258-5691 FAX: (609) 258-7715
kreutz at princeton.edu

From: [Joseph Bottero](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Mass. document format
Date: Wednesday, July 04, 2007 11:25:47 AM
Attachments:

I hope you understand that the Microsoft effort to make OOXML an international standard is nothing more than a ploy to kill ODF, which already **is** an international standard.

Microsoft's motive is nothing more than lock-in forever to Microsoft products. Microsoft must be dragged kicking and screaming into the modern age, and by accepting their patently false and self-serving arguments for OOXML Mass. is acting as an enabler and against everyone's best interests.

The choice is yours: either succumb to corrupt political pressure and be a laughing stock of the IT community, or show some backbone and do what you know is right.

Sincerely,

Joseph Bottero
jmbottero at comcast.net

From: [Nathanael Nerode](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Comments: Problems with new draft of ETRM v. 4.0
Date: Wednesday, July 04, 2007 5:44:43 AM
Attachments:

Rather than go through point by point I will focus on basics.

The most important purpose of this entire standards exercise is to ensure that electronic documents will be accessible, in their original form, far into the future, when current programs and computers are obsolete. This is extremely important for government documents.

To do this, the documents must be stored in a format which is extremely well documented, so that a new program could, straightforwardly, be written from scratch on a new model of computer, in order to read the documents, and the documents would appear essentially identical to the way they were created. The chart describes this documentation requirement as "Is the standard fully documented and publicly available?"

Ecma-376 Office Open XML Formats fails this requirement for fairly obvious reasons which are well-documented elsewhere. The description contains large holes: references to undocumented behavior of proprietary (and obsolete) programs, contradictory specifications, and plain old vagueness. It only has one implementation from one vendor (which may not even be complete); it is not clear that it is at all possible to implement a reader based on the specification. Contrast OASIS OpenDocument Format and Portable Document Format, both of which have full, clear specifications and multiple independent implementations.

OfficeOpenXML fails one of the fundamental purposes of the entire exercise. Yet it is now on the list of "standards". It should not be.

Nathanael Nerode
computer programmer

From: [Dscho](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Re: OOXML
Date: Tuesday, July 03, 2007 10:38:24 PM
Attachments:

Hi,

not that I believe it would change anything, but there are probably only two explanations for allowing a "standard" whose only connection to "open" is the first part of its name, while it is clearly everything _but_ open:

- either you are corrupt, or
- you are incompetent.

There are a number of standards which are really open, _fully_ documented, _fully_ royalty free, in the _best_ interest of customers.

OpenXML is _clearly_ not one of them.

What is the reason you gave in to Microsoft? The first or the second?

Ciao,
Dscho

From: [Jason Elwell](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Comment: ETRM v4.0
Date: Tuesday, July 03, 2007 10:00:04 PM
Attachments:

I DO NOT support the language in ETRM v4.0.

Specifically the language that broadens the definition of standards/specifications as enterprise standards. This recent revision broadens the proposed definition to:

"The ETRM is a living document, where open and/or de facto industry standards are continually evaluated"

I oppose the inclusion of "or de facto industry standards" in this statement.

Quite simply, I believe that the ETRM should only consider actual industry standards.

Regards,
Jason Elwell

From: [Manni Wood](#)
To: [Standards \(ITD\);](#)
CC:
Subject: ETRM v. 4.0 comments
Date: Tuesday, July 03, 2007 7:24:22 PM
Attachments:

Hello.

I am a 10+ year veteran of the programming world employed and living in Massachusetts.

I notice in ETRM v4.0 that whereas there is one standard for hypertext documents, and one standard for plain text documents, there are two standards for office documents, ODF and OOXML.

Supporting two office formats is a duplication of effort, and it worries me that my tax dollars will be used translating between the two formats.

In technical circles, ODF is the more highly-regarded format.

As of ODF version 1.1, there is support for accessibility: a legitimate concern that the Massachusetts state government should be lauded for requiring. (I assume this explains why the Bay State Council of the Blind assisted in the development of the 1.1 ODF standard.)

I hope that ETRM v. 4.0 gets streamlined to support only one standard: ODF 1.1. The state of Massachusetts certainly does not have two kinds of roads, nor two kinds of electricity, nor two kinds of telephones. Nor should it have two document formats.

Thank you for your time,

-Manni Wood

From: [dan moylan](mailto:dan.moylan)
To: [mass standards](mailto:mass_standards);
CC:
Subject: ETRM v4.0/OOXML
Date: Tuesday, July 03, 2007 5:22:03 PM
Attachments:

A couple of years ago the Massachusetts DIT announced that they would adopt the Open Document Format (ODF) for all state documents. Now, it seems, they are backpedaling and intend to include Microsoft's OOXML format, which is both connected to and encumbered with Microsoft proprietary formats. This is a step backward for Massachusetts and is certainly not in the public interest.

Approving OOXML/Ecma 376 as a global standard will encourage other vendors to push for multiple, unnecessary standards rather than achieving consensus on a single standard that will best serve the needs of all stakeholders, and not individual proprietary vendors.

Please do not do this.

J. Daniel Moylan
84 Harvard Ave.
Brookline, MA 02446-6202
617-232-2360 (tel)
810-454-1823 (fax)
jdm at moylan.info
www.moylan.info
[god's curse on html mail]

From: [jkefalas at comcast.net](mailto:jkefalas@comcast.net)
To: [Standards \(ITD\);](#)
CC:
Subject: Draft review of ETRM v. 4.0
Date: Tuesday, July 03, 2007 3:25:29 PM
Attachments:

I wanted to state my disappointment that the state will allow Microsoft Office Open XML to the listing as an open source document. I think we are all well aware that Open Office XML has not passed ISO. The best intentions started this open document format effort and it will be entirely blown away with this short sited proposal. I call on the removal of ooXML.

From: [Kayle Slay Sawyer](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Microsoft OOXML
Date: Tuesday, July 03, 2007 1:47:47 PM
Attachments:

I am deeply disappointed that Massachusetts is pursuing a second document format, Microsoft OOXML. The OASIS ODF is truly open and our promotion of the standard is highly commendable. The Microsoft file format is not only redundant and incompatible with non-Microsoft products, but is also technologically inferior.

The only advantage of Microsoft's format appears to be their money in government pockets. As a Boston resident, I hope that corruption does not prevail in this case.

Thank you.
Kayle Sawyer
24 Joy St
Boston, MA 02114

From: [Benjamin M. Schwartz](#)
To: [Wolf, Alice - Rep. \(HOU\);](#)
CC: [Standards \(ITD\);](#)
Subject: From a Constituent
Date: Tuesday, July 03, 2007 1:19:03 PM
Attachments:

Dear Rep. Wolf,

I am one of your constituents, a resident of Cambridge. I am a computer scientist, a graduate of MIT currently pursuing a Ph.D. at Harvard. I am writing to inform you of a major misstep made in the most recent draft of Massachusetts's Enterprise Technical Reference Model (ETRM), a document describing the state's Information Technology practices. In previous drafts, this document was lauded by computer scientists around the world for requiring the government to maintain its digital files in open formats. Currently, many Massachusetts government files are stored and published in closed Microsoft formats. Because Microsoft is the sole provider of software for editing these files, the state is effectively enforcing a Microsoft monopoly. The state is also forced to purchase Microsoft software, no matter the cost, just to access its own files. This sort of single-vendor lock-in is obviously unacceptable, even if the corporation in question did not have a history of illegal abuse of monopoly.

As of version 4.0 of the ETRM, this document no longer protects us from the Microsoft stranglehold. It lists Microsoft "Open XML" (ECMA-376) as one of the open standards for office documents. This is unacceptable, and a direct result of expensive, dishonest lobbying efforts by Microsoft. Microsoft's "Open XML" is not an open standard, despite the deceptive name; Microsoft has carefully written the specification in such a way that only Microsoft can ever implement it. By listing it as an acceptable standard, ETRM 4.0 undoes all of the progress made in previous drafts, costing the state untold millions in future software licenses and stifling local technology businesses.

I am far from a lone voice on this issue. There are thousands of other residents of Cambridge who are technologically aware, and our feelings on this issue are unanimous: Microsoft's so-called "Open XML" must be removed from the ETRM list of acceptable formats. We are watching our government carefully to see who represents the best interest of the state, and who has been duped by

Microsoft.

For one of the dozens of articles that have been written on this issue over the past 24 hours, read this webpage:

<http://www.groklaw.net/article.php?story=20070703002707260>

Cordially,
Ben Schwartz

From: [William Boyle](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Regarding "TECHNOLOGY SPECIFICATION: ECMA-376
OFFICE OPEN XML FILE FORMATS (Open XML)" in
ETRM v4.0
Date: Tuesday, July 03, 2007 11:30:21 AM
Attachments:

I object in the strongest possible terms the inclusion of this de-facto standard for office documents. There are a number of specific technical issues with this that make it less than "open", but 2 that stand out.

1. There are specific features in the ECMA specification for this standard that can only be implemented by Microsoft applications.
2. Microsoft can change the specifications at any time, and how they implement it.

As a result, this "standard" does not reduce the state's reliance on a single application vendor (Microsoft) as is the intent of ETRM. I strongly advise the State of Massachusetts to reconsider including ECMA-376 file formats as acceptable formats for state documents.

Sincerely,

William Boyle
Member, IEEE

From: [Steven Zakulec](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ETRM v. 4.0
Date: Tuesday, July 03, 2007 10:52:08 AM
Attachments:

Let me first say that previous revisions were very good, and for the most part I had no complaints.

The new version has a serious issue: why is OOXML suddenly acceptable?

Has something changed from previous drafts when it was not acceptable?

I would sincerely hope that the standards are not being lowered or ignored in order to accomodate a format (any format really).

Here is a small listing of reasons to go with ODF/PDF and not OOXML until it changes.

OOXML:

Many gaping holes in specification

Designed around MS Office exclusively

Only one implementation (theoretically possible to have more than 1 implementation, but will never be as good as MS's.)

Making a mockery of standards process

No guarantee MS will stick to the specification in the future, especially if competitors get close

ODF:

Fully open, specified

ISO standard

Multiple implementations, with more being done

Available now for every platform

PDF:

Fully open, specified

Submitted to ISO

Multiple implementations

Available for every platform

From: [Jeffrey Kesselman](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Don't fall for MSFT maneuver
Date: Tuesday, July 03, 2007 10:40:07 AM
Attachments:

History has taught us that Microsoft has no shame when it comes to embracing something just long enough to kill the competition and then abandoning it.

It is clear that this "Open XML" document standard they are championing is a desperate last ditch attempt to keep control of the key office market. If you fall for it, rest assured they will abandon open-ness the day they have killed the truly open alternatives.

Don't be seduced, stick to ODF and OpenOffice.

Jeff Kesselman
14 Bennett Cir
Billerica, MA 01821

--

~~ Microsoft help desk says: reply hazy, ask again later. ~~

From: [Vaverchak, Timothy \(ITD\)](#)
To: [Lockwood, Gillian \(ITD\);](#)
CC: [Pringle, Simone \(ITD\);](#)
Subject: FW: Breif comment on "Open" XLM document format
Date: Tuesday, July 03, 2007 10:19:18 AM
Attachments:

I see Claudia is out of the office, and I'm not sure if you get emails to this address... So here you go.

Tim

-----Original Message-----

From: Steve Richards [<mailto:steve at aducredit.com>]

Sent: Tuesday, July 03, 2007 6:55 AM

To: openstandards (ITD)

Subject: Breif comment on "Open" XLM document format

Please reconsider your decision on allowing Open XML as a qualified document format.

Until this format is widely supported by other vendors you would be locking in all of the citizens of this Commonwealth to the Microsoft monopoly.

You do us all a disservice, and increase the cost government in this state.

Regards,
Steve

--

Email Sent From Steve Richards

----- Mozilla Thunderbird 2.0 running on
SuSe Linux 10.2 (Open Suse)

From: [Mike Depot](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Ecma-376 Office,Open XML File Format
Date: Tuesday, July 03, 2007 9:45:44 AM
Attachments:

I understand Massachusetts is considering adopting a file format which is proprietary to Microsoft. I am writing to oppose the inclusion of the Ecma-376 Office Open XML File Formats as an acceptable format for Massachusetts state documents.

Aside from there being numerous published articles stating technical reasons not to adopt Microsoft's bloated format, there are also ethical reasons to embrace free and open standards that are accessible to everyone in the state, not just the people who can afford to purchase expensive proprietary software. While there may be some alternatives, Microsoft has a long track record of being accused of unfair business practices, and could later decide to use the proprietary limitations of their format to attempt to drive out alternatives.

I instead encourage the continued adoption of free and open standards such as ODF (Open Document Format). Massachusetts gained a lot of respect from the community when it originally announced it's intention to embrace free and open standards. This allows better accessibility to people with limited resources. Aside from that, if business's like Microsoft really want to work with government agencies, they can always add better support for open formats to their products. And you can bet they will do just that if government put it's foot down and establishes what is ethically acceptable for the good of the commonwealth.

Thank you for your consideration in this matter,

Mike Depot
5 Chestnut Street
Plainville, MA
mdepot at comcast.net

My vantage point, in addition to being a citizen of Massachusetts, stems from my role as an editor and writer creating books and articles on many technical topics, both open source and Microsoft-related. Working in the publishing industry, I am very aware of the strengths and weaknesses of different formats and the implications of using them. I have also spent years talking to people around the world about standards and open formats, and have followed the ODF/OOXML debate from the start.

In your very own draft, in the Information Domain section, you state one of the benefits of XML as:

Long-term reuse of data, with no lock-in to proprietary tools or undocumented formats

But that's true only if the particular XML implementation is unencumbered and disconnected from proprietary formats. The Ecma-376 standard fails these tests, and therefore violates the principle stated in the standard.

Please look beyond the formality of adoption by a standards committee and consider the features of the actual standard. The encumbrances on The Ecma-376 standard have been widely aired and thoroughly documented. A useful summary appears here (it is on my company's web site, but we do not officially endorse it):

<http://www.onlamp.com/pub/a/onlamp/2007/06/14/achieving-openness-a-closer-look-at-odf-an\d-ooxml.html>

<<http://www.onlamp.com/pub/a/onlamp/2007/06/14/achieving-openness-a-closer-look-at-odf-an%5Cd-ooxml.html>>

It is not in the public interest for Open Document Format, a lightweight, publicly developed standard with multiple alternative implementations, to be driven out by a monster of a specification (6,000 pages) that has legal encumbrances and other complexities that mean it can be implemented by only one vendor.

From: [Phil LaFond](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Document Comment
Date: Tuesday, July 03, 2007 9:38:04 AM
Attachments:

I was pleased to read the announcement that the Commonwealth of Massachusetts had decided to adopt an open document standard. I am now disappointed to find that the "standard" chosen is one created and controlled by Microsoft Corporation. There are many problems with the Open XML format, many of which are outlined here: http://www.grokdoc.net/index.php/EOOXML_objections, and it bears reconsideration. There may be some international agencies willing to certify Open XML as a "standard", but it is not ISO certified.

I would rather see my tax dollars go to the development of true open source and open document formats rather than large, for-profit corporations. Implementing an open document strategy that relies on Microsoft to control the format is akin to letting the wolf guard the henhouse and is a mistake. I urge you to reconsider.

Philip J. LaFond
111 Lenox St Ste 106 #144
Norwood, MA 02062
508.275.2274

From: [singingfalls](#)
To: [Standards \(ITD\);](#)
CC:
Subject: open standards
Date: Tuesday, July 03, 2007 9:35:37 AM
Attachments:

Dear sirs,

I am very sorry that the State has caved in to pressure from Microsoft.

Ecma-376 Office OpenXML is not an open standard and does not meet the criteria set by the State. Please reconsider offering this option.

regards,
Stanley Petrowski

From: [Bo Register](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Ecma 376 - Office Open XML Formats (Open XML)
Date: Tuesday, July 03, 2007 9:27:22 AM
Attachments:

I am opposed to this 'revision'.

The 'Standard' is not published and available for review (the internal references to non published documents means the standard in total is NOT available).

Documents published in their still proprietary, still secret format will not be fully translated to open standards, and will not remain accessible when Microsoft changes the internal document formats.

Why would you accept this from Microsoft?

From: [Seth Tuthill](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Standards
Date: Tuesday, July 03, 2007 8:29:54 AM
Attachments:

1. Please review thoroughly the definition of "Standards". It appears there is some confusion over its definition. Perhaps someone in the department has a technical dictionary?
2. Your link does not work as an email address. Perhaps someone could look into this. Although it is not difficult to manually type the address, the "link" should be removed or fixed so it works as advertised.

thanks, s.e.t.

From: [Stuart MacDonald](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Massachusetts, what happened?
Date: Tuesday, July 03, 2007 7:51:59 AM
Attachments:

For a while there it looked like you knew what you were doing. But now you've gone and included OOXML, a closed, proprietary "standard" into your selection process.

Here's a free tip: Vendor lock-in, which is what you will experience if you go ahead and use OOXML (a closed, proprietary "standard"), causes "negative business impact".

Here's another free tip: a properly chosen, open, fully documented standard is what lays the foundation for interoperability. Interop is built upon a standard. It is the next layer up. To say that you want one standard to interoperate with another is nonsensical.

Wake up. Do the right thing for your people. Pick open, fully documented standards. Reject the closed, proprietary, partially documented mess that is OOXML. Change your process back to the one you had before so that crap can't worm its way in again.

The point is to not let one vendor control whether or not you can access your documents.

...Stu

From: [Goldman](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open Standards
Date: Tuesday, July 03, 2007 7:19:46 AM
Attachments:

Get with the program.

Open standards for document storage means a native format that anyone can read and write to.

Not some mocked up translator to kinda sorta allow you do do a one-time export-import between programs.

For Microsoft software to meet both the letter and the spirit, it need to allow you to KEEP all your documents format that others may DIRECTLY access them.

Please, show the country that you have principles, and have not slipped back into the same old world of political impotence.

Require that a true open standard for document storage and interchange be used.

Sincerely,

Herb Goldman

Reference: <http://www.groklaw.net/article.php?story=20070703002707260>

From: [Frank D'Angeli](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Microsoft Office Change in Software
Date: Tuesday, July 03, 2007 6:55:12 AM
Attachments:

Dear Bethann Pepoli,

It was with a little bit of horror and disgust today that I read your comments regarding Microsoft's XML format in which you stated that 'it does meet our criteria for an open standard'.

As someone that has been involved in IT for over 27 years, please let me relate a bit of history to you.

Microsoft (and the transcripts from their anti-trust trial will back me up) is probably the most unethical, corrupt corporation this country has ever seen. From the extortion of original equipment manufacturers to the sabotage of competing software programs, they have pulled every dirty trick in the book to cement their illegal monopoly. The Justice Department was supposed to break up Microsoft to punish them for their misdeeds but massive campaign contributions to Bush and Ashcroft ensured that they would not be punished.

Judge Jackson had stated that Bill Gates and his cronies were like Mafia and drug lord kingpins. You cannot trust these people for a second. Look what they did to Java. They licensed it from sun then 'pissed all over it' to ruin its standard. They then tried to 'kill the baby' regarding Apple's QuickTime format. There are hundreds of examples of their unethical behavior.

Now, I don't know if you're a Microsoft apologist, a paid spokesman, or whatever. But no one with any moral backbone would give Microsoft an inch. They've cost consumers billions and billions of dollars due to their buggy, virus supporting software over the years and they've stifled innovation.

You have a responsibility to the taxpayers of the Commonwealth.

Please, I beg of you, do not let Microsoft off the hook. Why should I pay for people to use MS Office when there are free programs out there that will do the same thing if you make the right decision. Please don't feed the evil empire any more of my money.

Sincerely,

Frank D'Angeli
90 Hopkins Street
Wakefield, MA 01880

From: [Dr Tony Young](#)
To: [Standards \(ITD\); Bevan Hay\(Home\);](#)
CC:
Subject: Your "approval" of Microsoft's OOXML proprietary format
Date: Tuesday, July 03, 2007 3:45:42 AM
Attachments:

Dear Sir,

I am not a citizen of the United States, I live in Queensland, Australia. However, I want to communicate my extreme distress at the step you are apparently taking to "rubber stamp" Microsoft's OOXML format as a default document standard for the State of Massachusetts.

In brief, OOXML is not an open format, it is a proprietary format owned and controlled by a single commercial entity: Microsoft. Further, the structure of OOXML can be changed overnight at Microsoft's commercial whims (no-one else has that vested power) and a single change by that company has the ability to render OOXML documents unreadable in any software other than that produced or owned by Microsoft. Worse still, it has been shown that OOXML contains major software flaws. Finally, Microsoft has no intention of releasing all the details of its proprietary OOXML format. Why should it ? If other software cannot effectively transfer/receive data to/from the Microsoft software, it prevents any commercial competition in an open market place.

The ISO-approved ODF formats however, ARE open formats controlled by non-commercial world bodies. The ODF structures have been fully documented and are completely open for ANY entity to use without any restriction whatsoever - and that includes Microsoft. I would ask you to consider the underlying reasons for Microsoft's continuing refusal to utilise the ODF standards: it allows Microsoft to continue user-lock-in to their proprietary formats and perpetuation of their very destructive software monopoly in the United States of America. Non-American countries outside Microsoft's control are now moving extensively to ODF formats. As a result, the United States of America are progressively being placed in an IT backwater by the policies espoused by Microsoft in its desire to retain its monopoly. And those policies are being assisted by unknowing political frameworks.

I beg that the State of Massachusetts seriously reconsiders what they are throwing away by setting up OOXML as a "State Preferred Format" alongside ODF. The whole idea of moving to ODF was to provide a standardised format that would never be superseded, outdated or rendered impossible to read because of changes to proprietary formats.

Massachusetts has been given an amazing, "once in a lifetime" opportunity to move to a universal, standardised, ODF format that will allow State documents to be read immediately at any time in the future. Instead, it appears that one proprietary, substandard, closed, binary format ("anypaper".doc) is being exchanged for OOXML, a format which will shortly produce precisely the same situation as the Microsoft binary files.

I would ask in the strongest possible terms that OOXML be rejected as a default co-standard for the State of Massachusetts. Your State has the chance of being seen as a world leader in innovation and communication if it selects ODF as its single standard. To select OOXML places the State of Massachusetts firmly in the dead end of proprietary software domination.

Yours sincerely

Dr Tony Young

--

Dr Tony Young
100 Langton Road
Blackbutt Qld 4306
Australia
ph (07) 4163 0395
fax as above

A computer is like airconditioning;
it's useless if you open Windows.
(Linus Torvalds)

Try Linux - it doesn't have viruses.

From: [Ray Lambert](#)
To: [Standards \(ITD\)](#);
CC:
Subject: ETRM v4.0
Date: Monday, July 02, 2007 6:57:51 PM
Attachments:

Hi,

As a software engineer with over 20 years of professional experience and a life-long resident of Massachusetts, I'd like to offer my opinion on ETRM v4.0 and, in particular, the OOXML issue.

Despite what Microsoft will have you believe, OOXML is **not** an open format. There is much evidence for this readily available all over the web. ECMA, unfortunately, has proven itself to be a rubber-stamp organization, in the business of simply putting their imprimatur onto whatever document a commercial organization wishes so that they can pass it off as a standard. Recent activities have made it obvious that ECMA "standards" cannot be taken seriously and, therefore, nor should OOXML.

ODF **is** a true open standard, in every meaning of the phrase, and it is the obvious best choice for standardization by Government bodies. It offers true non-discriminatory access to **all** users as well as a clear path for document preservation into the future.

OOXML fails on all these counts (and many others).

Adopting two standards is **not** a beneficial solution. Multiple standard formats (which serve the exact same purpose) do not make a standard; they can only create chaos. Adopting either ODF or OOXML will incur some transitional costs. However, adopting both will create perpetual chaos as State users will forever be in "document conversion hell".

Microsoft's actions surrounding the ETRM process have, frankly, disgusted me. It pains me that after all of their bad actions they might be rewarded by having OOXML adopted by the State at the expense of tax payers and state employees (who will have to live with the resulting mess).

The worst part of it all is that Microsoft is **completely** free to implement ODF in their own office suite and avoid any impact on their potential sales opportunities. The only reason they won't do so is because they are acting to preserve their illegal monopoly. Anyone with any knowledge of the computer industry recognizes by now that Microsoft's Office file formats are the linchpin of their entire monopoly. This is why they fight so hard (and use such dirty tactics) against ODF. If ODF becomes the dominant format, Microsoft loses the unfair market advantage of document format lock-in; a highly-questionable tactic in the first place as it effectively holds their customer's data hostage for Microsoft's own benefit. (I consider that a form of stealing and I've often wondered if it shouldn't be illegal; it is certainly unethical.) One might assume that if Microsoft is as innovative as they are fond of telling everyone, they could simply add ODF support to MS Office and compete successfully on the basis of the technical superiority of their products (especially considering the great lead they have). Unfortunately, it seems that MS are unwilling or unable to compete in this way and instead prefer to compete based on dirty tactics (including threatening Federal, State and Foreign Governments).

Although part of my objection to OOXML is based on disgust with Microsoft's business practices, I want to be clear that my objections are also based in large part on its technical merits (or lack thereof). I have reviewed many technical evaluations of OOXML and find it to be severely lacking in many areas. Some of the problems I have noted include: it has a poorly-formed XML structure which is expected to work poorly with SOA implementations; it incorporates poorly-defined or outright undefined content sections which probably consist of proprietary elements that only Microsoft will be able to implement; it includes a vast amount of completely useless "backwards compatibility" data (with proprietary elements); embedded objects mostly rely on additional proprietary Microsoft formats which are not open and not fully documented; I could go on but many folks have already done a great job at detailing all of OOXML's problems and a single web search will reveal all of this and much more. In the end I believe that OOXML is a poor product, from a technical perspective, and, therefore, a poor choice for standardization.

In summary, as a technologist and a Massachusetts taxpayer, I ask you to please not become a pawn in the protection of Microsoft's monopoly. Please do what is best for the state and the citizens: drop OOXML and adopt ODF as the single standard office document format for Massachusetts.

Thank you,
Ray Lambert

From: [ted johnson](#)
To: [Standards \(ITD\);](#)
CC:
Subject: Open office
Date: Monday, July 02, 2007 6:22:15 PM
Attachments:

Having been forced to use Word these many years as a state employee, I had hoped you would stick with the proposed ODF format, which I use whenever I can and export in a .doc format for those without open office. It's too bad you are going with Microsoft again. Ted Johnson

From: [Jon Merripen](#)
To: [Standards \(ITD\)](#);
CC:
Subject: OOXML/ODF
Date: Monday, July 02, 2007 6:13:25 PM
Attachments:

As a Massachusetts native, I must say that I'm often very proud of the innovative stance Massachusetts takes on many social issues - gay marriage and universal health care come immediately to mind. It therefore dismays me greatly to see the ITD give in so transparently to big business in the form of Microsoft and their powerful lobby on such a basic issue of freedom. As a computer professional, I understand the issues involved in electronic standards; I further understand the need for independence and redundancy in a government's business, and, therefore, its documentation.

I understand that Massachusetts has removed an officer who took an innovative stand against a corporate giant that threw its weight at him, and was removed from office for it.

What I do not understand is why otherwise sensible people do not make the essential, basic connections needed for this type of decision:

Will Microsoft charge for access to the commonwealth's documentation if it is in OOXML format? Can it?

If Microsoft decides to deny access to OOXML the commonwealth, through technical or legal means, what realistic recourse does the commonwealth have?

Why is it a good decision to cede control of the government, in the form of its data and documentation, to a corporation that does not have the commonwealth's best interests as its core motivation - only its own profit and market share? What happens when there is a direct conflict between the commonwealth's interests and Microsoft's bottom line?

I'm sure someone in the commonwealth has asked these very valid questions; why hasn't the standards office?

From: [John Stoffel](#)
To: [Standards \(ITD\);](#)
CC: [john at stoffel.org;](mailto:john@stoffel.org)
Subject: Comments on ETRM v4.0
Date: Monday, July 02, 2007 5:02:46 PM
Attachments:

Dear Sir,

I have recently read the Major Revisions for ETRM v4.0 and the Introduction (ETRM v4.0) and I would like to submit some comments. As a citizen of the commonwealth who lives in Boylston, I would hope that my input has some bearing.

In the Introduction document, you define Open Format as:

Open Format - The Commonwealth defines open formats as specifications for data file formats that are based on an underlying open standard, developed by an open community, affirmed and maintained by a standards body and are fully documented and publicly available. (ETRM, Information Domain)

Yet in the same document you have the Ecma-376 Office Open XML Formats (Open XML) listed as an open format, which I object too strongly. Most of my objection is due to the standard specifying features in regards to how a proprietary (and in some cases obsolete and non-maintained) application formatted documents.

This goes against all understanding I have about the purpose and use of Open Formats (or Open Standards), since they must be useable by all parties. For the Ecma-376 proposed ISO standard, with it's single implementation, and it's reliance on a single vendor's proprietary products as the "standard" to compare to, it's not something I think our Commonwealth should be adopting as a standard.

And most certainly not before (if ever!) it becomes an ISO standard.

I also object to the inclusion of the Ecma-376 standard into the ETRM v4.0 framework because of the duplication of effort. There is already

a perfectly acceptable ISO standard that has multiple implementations and a clean and un-encumbered specification. Why do we need to have a competing standard? If the Ecma-376 standard is so great, why aren't those pieces which stand out pulled into and included into the existing ISO standard, OASIS Open Document Format For Office Applications (OpenDocument) v. 1.1?

I wish I was articulate enough to enumerate the many deficiencies and problems inherent with the Ecma-376 proposed ISO format, but I will leave that to others.

But I do want to strongly express my displeasure at the inclusion of the proposed Ecma-376 standard into *any* version ETRM framework.

Sincerely,
John Stoffel
25 Fox Tail Way
Boylston, MA 01505
508-736-5499 (cell)
508-869-2362 (home)

From: [Andy Oram](#)
To: [Standards \(ITD\)](#);
CC:
Subject: Opposition to Ecma-376 for state use
Date: Monday, July 02, 2007 3:42:12 PM
Attachments:

I am writing to strongly oppose the inclusion of the Ecma-376 Office Open XML File Formats as an accepted format for Massachusetts state documents. I also want to protest the addition of this format with minimal publicity and a limited time for comment during a busy summer period when many people are away.

My vantage point, in addition to being a citizen of Massachusetts, stems from my role as an editor and writer creating books and articles on many technical topics, both open source and Microsoft-related. Working in the publishing industry, I am very aware of the strengths and weaknesses of different formats and the implications of using them. I have also spent years talking to people around the world about standards and open formats, and have followed the ODF/OOXML debate from the start.

In your very own draft, in the Information Domain section, you state one of the benefits of XML as:

Long-term reuse of data, with no lock-in to proprietary tools or undocumented formats

But that's true only if the particular XML implementation is unencumbered and disconnected from proprietary formats. The Ecma-376 standard fails these tests, and therefore violates the principle stated in the standard.

Please look beyond the formality of adoption by a standards committee and consider the features of the actual standard. The encumbrances on The Ecma-376 standard have been widely aired and thoroughly documented. A useful summary appears here (it is on my company's web site, but we do not officially endorse it):

<http://www.onlamp.com/pub/a/onlamp/2007/06/14/achieving-openness-a-closer-look-at-odf-and-ooxml.html>

It is not in the public interest for Open Document Format, a lightweight, publicly developed standard with multiple alternative implementations, to be driven out by a monster of a specification (6,000 pages) that has legal encumbrances and other complexities that mean it can be implemented by only one vendor.

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