

Template for comments and secretariat observations

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1	2	(3)	4	5	(6)	(7)
CH	Part 1, introduction (page xii) and entire document		te	It is not acceptable for an international standard to be designed primarily around the goal of compatibility with a particular company's products. This is particularly inappropriate where, as in the present case, compatibility with an existing international standard is neglected in favor of the one-sided goal of maximal compatibility with document file formats introduced by one company, and where the proposed standard does not provide equal opportunities for compatibility to that company's present and future competitors. Unless this shortcoming of DIS 29500 is fixed, accepting this specification as a national or international standard would be a violation of Swiss and international law.	Change the goal from being „fully compatible“ with „existing investments in Microsoft Office documents“ to seeking at attain the same high level of compatibility not only with Microsoft's formats, but also with the international norm ISO/IEC 26300 (OpenDocument). Review the entire draft standard and modify it corresponding to this revised goal.	
CH	Entire document		ge	Microsoft's "Open Specification Promise" is explicitly restricted to only "the required portions of the Covered Specification" (emphasis added). While this promise may be valuable with regard to specifications that declare all of the important functionality as required and only unimportant additions as optional, in DIS 29500 sections 2.4, 2.5 and 2.6 clearly (and in fact appropriately) describe most of the functionality provided by DIS 29500 as optional rather than required for a conforming implementation.	Microsoft should publish a stronger "open specification promise" which is not limited to only the "required" portions of covered specifications.	
CH	Entire document		ge	There is at least legal uncertainty about whether Microsoft's "Open Specification Promise" is compatible with the GNU LGPL license under which OpenOffice, which is currently the primary competitor to Microsoft's office software, is licensed. Richard Stallman, the author of the GPL and LGPL licenses, has publicly stated that relying on Microsoft's promise (this presumes accepting Microsoft's patents as valid) would violate the GPL (see http://www.eweek.com/article2/0.1759.1829728.00.asp). Stallman's remarks apply equally to the LGPL, the relevant provisions of which are identical to those in the GPL. Microsoft's website addresses the question of the GPL compatibility of the "Open Specification Promise" by refusing to take position on this question, stating only that the GPL "is not universally interpreted the same way by everyone" and "based on feedback from the open source community we believe that a broad audience of developers can implement the specification(s)." While it	Microsoft should, in addition to the "open specification promise", make any relevant patents it controls available under a license which is clearly compatible with GPL and LGPL.	

1 **MB** = Member body (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

NOTE Columns 1, 2, 4, 5 are compulsory.

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				is certainly true that free software and open source licenses exist which are compatible with Microsoft's promise, the primary question is whether DIS 29500 can be implemented in derivative works of the LGPL-licensed OpenOffice software. It is not fair if only Microsoft can implement the standard directly in their office software while competitors have to use a different format internally and must rely on document format conversion utilities.		
CH	Part 2		ed	There are many normative references to "the ZIP file format specification", but no actual such specification is included and no explicit reference to any such external document is provided.	Provide a detailed specification for the "ZIP format" or provide a normative reference to a specification which must itself be an open standard	
CH	Part 3, 3.16.9 Part 4, 3.17.4.1		te	Disallowing dates before 1900 in spreadsheets is wrong. There are people alive today who were born before 1900. Historical studies often consider dates before 1900.	Allow the "serial value" to be negative.	
CH	Part 4, 3.17.4.1		te	DIS 29500 specifies that in the year 1900, "for dates between January 1 and February 28, WEEKDAY shall return a value for the day immediately prior to the correct day" and also assigns a "serial value" to the non-existing day February 29, 1900. This is wrong. Software bugs should be fixed, not exported by means of ISO standards to the programs of competitors.	Make the calendar system configurable, with a default of the Gregorian calendar, allowing alternatives to be specified by means of providing code for the computation of year, month, weekday and day-of-the-month. This mechanism can then be used for replicating the broken behavior of Microsoft Excel where that is desired.	
CH	Part 3, 3.16.9.1 – 3.16.9.3 Part 4, 3.17.4.1 3.17.6.7		te	Having two different date systems with different base dates side-by-side in the same standard document format makes no sense. Rather, it is appropriate to fix a single base date. Applications which use a different base date can convert from the date representation used in the standard document format to the application's preferred date representation, and vice versa.	Delete all references to the "1904 base date system".	
CH	Part 4, 3.17.4.2 3.17.6.7		te	In the internet age, it is inappropriate to represent times simply as a numeric value without timezone information.	Specify that when stored in OOXML files, dates and times are always expressed in terms of UTC. Add a mechanism for storing in the file information on what timezone should be used to represent the time in human-readable form.	
CH	Part 4, 3.17.4.3		te	The "combined date and time representation" is broken in Switzerland and all other locales which switch to daylight-saving time and back, on those days which are 23 hours or 25 hours long instead of the usual 24 hours.	This problem is most easily avoided by always using UTC for the "combined date and time representation".	

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CH	Part 4, 2.18.52		te	Having two different language representation systems, one based on ISO standards and one with arbitrary hexcodes for a subset of the languages makes no sense. Applications which use arbitrarily-chosen numeric values to represent some languages can convert from the standard language representation system to the codes they use internally, and vice versa.	Delete all references to ST_Langcode.	

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