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EDITORIAL:

The Overwhelming of ISO/IEC JTC1

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On February 25 the doors of a conference room in Geneva, Switzerland will swing open to admit 120 standards professionals from 40 nations around the world. The unenviable goal of these chosen few over the ensuing five days will be to reconcile the technical comments that have been tendered in relation to a single specification proposed for adoption by ISO/IEC JTC1. I say unenviable, because what happens behind those doors after they close will more likely resemble a contentious debate in the General Assembly of the United Nations than the purely technical deliberations of a standards committee.

The reason, of course, is that this is no ordinary specification, but DIS 29500 (a/ka/ Ecma 376 Office Open XML, and more commonly referred to as simply "OOXML"). Few would disagree that OOXML has garnered more vendor attention, attracted more efforts (both pro and con) in more countries around the globe, and earned more publicity than any other IT specification in recent memory. Quite simply, it is the standard of the decade – at least if conflict is the metric.

Last year, OOXML failed to achieve the necessary support to progress directly to final approval. Along the way, it accumulated 3,522 comments, and the purpose of the Ballot Resolution Meeting (BRM) that will commence on February 25 will be to attempt to resolve a sufficient number of those comments to the satisfaction of the relevant JTC1 members to allow OOXML to be finally approved. That determination will be made in the thirty days following the close of the BRM on February 29.

Alex Brown, the designated Convenor of the BRM, is likely to face a daunting challenge in managing the process, due to the level of emotion that has surrounded the consideration of OOXML to date, the shear volume of comments that must be addressed, and, finally, the overwhelming length – 2,300 pages – of the formal Proposed Disposition of Comments document that was released on January 14th to the National Bodies (but not the public), and which will function as the basis for discussion.

While the proposed dispositions have been released in batches beginning in December, someone just commencing the chore of wading through them on January 14th would need to understand, evaluate and form an opinion on over a hundred comments, and more than half that many pages, every day of the week

between now and February 25th. Given that each comment disposition previously released was packaged in its own, separate PDF file, and posted to a Web site in batches of 500 or more at a time, that is presumably what many delegates will in fact need to do. More than ironically, OOXML was submitted to ISO/IEC JTC1 under its "Fast Track" process, although the specification itself was over 6,000 pages in length.

Given the technical complexity of both the comments submitted as well as the dispositions proposed by Ecma, BRM attendees will be severely tested by the challenge of fully reviewing the resolutions proposed by Ecma in the dispositions document and considering what helpful alternatives they might offer in their stead. Certainly the time available will offer little opportunity for attendees to talk in advance among themselves.

Of equal concern is the fact that only one week will be available for the BRM to complete its work, with no provision for an extension. Whatever is completed to the satisfaction of the attendees by the end of the week – and as significantly, what is not – will obviously have an impact on the final outcome. Happily, many of the comments that must be addressed are not likely to be contentious, and Alex Brown anticipates that the resolutions to these comments will be approved quickly, and in batches. Whether or not all of the remainder can be discussed to the satisfaction of those in attendance, however, remains to be seen.

Achieving that result will be Brown's goal, and last year he launched a blog at which he has regularly shared his plans for managing the BRM, displaying both a sense of humor as well as a commendable determination to conduct the meeting in a no-nonsense fashion. If he can maintain both order as well as his composure (let alone his sense of humor) through to the conclusion of the process, he will have performed well indeed.

But what will the outcome of the BRM be, and how well will it reflect on the process that will conclude at the end of March? Here are a few observations to consider in formulating an answer to that question:

- Many members of SC 34, the committee that considered OOXML last year, complained that they had too little time to properly review OOXML, due to its unprecedented length.

- It has been universally acknowledged – including by some at Microsoft – that OOXML was in need of serious improvement at the time it was submitted to ISO/IEC JTC1, even though it had been processed and approved by Ecma for that purpose.

- Due to the 6,000 page length of OOXML, not all problems are likely to have been identified during the formal review period. But any deficiencies in OOXML discovered after September 2, according to the JTC1 Directives as cited by Brown, are "out of scope," and may not be addressed at the BRM. Instead, they must await resolution in the next review cycle (i.e., years in the future).

- The only complete office suite implementation of OOXML to date is Microsoft Office 2007, which has already shipped. If OOXML is approved, it remains to be seen whether, and if so when, it will be implemented in its final form by Microsoft, and if so, how many of its customers will install the service packs or other updates that would bring their software into compliance. Any discussion of these issues will also be "out of scope" at the BRM, which is intended to address purely technical issues, and there is no other venue at which such issues can be discussed and addressed. As a result, the main goal used to justify the adoption of a second format standard for editable documents may not be achieved – assuring access to documents already created in Office by means of an open standard – in the future. Moreover, in early January it became known that Microsoft had issued a service pack in September to Office 2003 customers that deliberately disabled their ability to access documents originally created in some earlier versions of Office, undercutting the rationale for adopting a second revisable open format document standard at all.

- It does not appear at this time as if the resolutions proposed by Ecma will be made available at a public Web site before the BRM, if ever. Consequently, the 500 million users of Office and the legions of independent software vendors whose software must be used in conjunction with Office will have no opportunity to convey their opinions to the delegates that will nominally represent their interests at the BRM.

- The final vote on OOXML will follow the conclusion of the BRM, whether or not all comment resolutions have been resolved. It appears that if the vote is in favor of adoption, unresolved comments will not be dealt with, if ever, until the next review cycle.

- No outsiders will be allowed to attend the BRM, nor will any transcript be prepared and made available.

Brown points out at his blog that much of this is in compliance with the JTC1 Directives, and that the rest is at least not in violation of those rules.

Because a proceeding is in compliance with an established process does not, of course, guarantee a good outcome, especially where the process has changed little while much else has evolved in dramatic fashion. Pushing a specification through Ecma and ISO/IEC JTC1 at maximum speed serves to illustrate the shortcomings of a process that is at minimum not up to the challenge of performing in so highly charged a competitive setting, nor appropriate for a specification of such great length. It also calls into question whether a quasi-governmental process involving national representation and the adoption of standards with universal impact has any business being so non-transparent, whatever the historical rationale for such secretive practices may have been.

Moreover, the progress of OOXML through the ISO/IEC JTC1 process has been rife with accounts of undue vendor pressure, and in some cases, improper vendor conduct, that in most cases appears not to be covered by any rules at all. The wide publicity that this conduct has rightly been given hardly reflects well on a system

that allows such conduct to occur without consequences, nor does it help to inspire public faith in the integrity of that process, or its deliverables.

The result is that if OOXML is finally approved, it may not be of the quality that the imprimatur of the ISO/IEC is presumed to indicate, given the limited amount of time available for the BRM, the insufficient time allowed to non-National Body stakeholders to review the proposed dispositions, in advance, or to offer useful comments of their own, and the fact that not all deficiencies may be eligible for discussion at the BRM. At the same time, if OOXML is not approved, it will provide scant vindication for the process, due to the great deal of effort and energy expended by a very large number of people to no useful purpose. If OOXML was destined to garner 3,522 comments, why did Ecma allow it to progress to ISO/IEC JTC1 at all? More importantly, what steps will be taken to ensure that a similarly lengthy and flawed specification is not "fast tracked" again?

Moreover, assuming that Microsoft is right in its opinion that the world would be a better place with OOXML as a *de jure* standard, then all concerned would have been better served – including Microsoft – had the rules required Ecma to do a more thorough job, and then allowed ISO/IEC JTC1 to proceed at a pace more suited to the length and complexity of the OOXML specification.

Perhaps most troubling is the fact that a global system that purports to represent the interests of "all stakeholders" and reserves the right to itself to define the minimum attributes of the processes that create "open standards" can operate with so little visibility and accountability to those same stakeholders.

Whatever the ultimate fate of DIS 29500 may be, the very public progress of OOXML in ISO /IEC JTC1 from beginning to end has revealed a process that is in need of serious review and revision. Hopefully that task will be undertaken soon, and performed thoroughly and well, if the traditional standards process is to remain relevant and useful to a modern world.

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