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Secretary to the ICT Standards Consultative Committee,
NSAI,
Glasnevin,
Dublin 9,
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Objections to ISO/IEC DIS 29500: OOXML proposed standard

Dear Dr. Cowan,

On behalf of the members of the Irish Free Software Organisation, I am writing to you to express a number of serious concerns we have regarding the ISO/IEC DIS 29500, the proposed standard for OOXML. We understand that the proposal is now in a five month consultation phase, and that it is appropriate at this time to raise technical issues.

The ISO description of a standard indicates that it “provides, for common and repeated use” (ISO/IEC Guide 2:2004, definition 3.2). A standard which can only be implemented by one vendor cannot meet this criterion. Neither can a standard for which full conformance is defined in terms of the behaviour of a specific vendor’s applications. The OOXML proposal is subject to both of these flaws.

The proposed standard supports “backward compatibility with documents created in legacy applications” (Part 4, §2.15.3). This section describes how the proposed standard allows documents to contain elements which require consuming applications to emulate the behaviour of specific Microsoft products. An example is the element “autoSpaceLikeWord95” in Part 4, §2.15.3.6. Not only does the proposal fail to describe the required behaviour, it implies that the behaviour *cannot* be adequately described (see the guidance paragraph in the referenced section).

Many features of the language, such as the above, are described as “optional”. Standards often allow optional features. However, in order that vendors can “opt” to support them, such features must be described in full. Without such descriptions, third-party implementations of the OOXML standard would be necessarily incomplete.

No mechanism is provided for legacy formats not already mentioned in the OOXML proposal. No extension mechanisms are described which would allow other vendors to add support for their legacy formats to be added. Apparently the standard serves only the needs of Microsoft in representing legacy documents.

A similar set of issues arise where applications are required to consume “Alternative Format Import Part” sections (Part 1, §11.3.1). Of the formats listed as being eligible for inclusion, only one is a standard format; the others are Microsoft proprietary formats. Nevertheless, a “WordprocessingML consumer shall treat the contents of such legacy text files as if they were formatted using equivalent WordprocessingML”. No mechanisms for such conversion are specified, and no descriptions of the proprietary formats are given. It appears again that this required behaviour of applications cannot be implemented by other vendors.

In addition, the proposal suffers throughout from an underspecification of important features; styles and other crucial formatting elements are given names but no description of the appearance is associated with the name. Guaranteeing conformance and interoperability is therefore impossible.

Finally, serious questions exist regarding support for accessibility in the proposed standard. Microsoft's own white paper on the subject "Accessibility of Ecma Office Open XML File Formats" indicates that the proposal fails many of the W3C's "Web Content Accessibility Guidelines" (WCAG).

While no standard will ever be perfect, the OOXML proposal contains flaws that makes it unworkable as a standard. In light of this, we urge the NSAI to take a position. We call on NSAI to vote against the adoption of the proposal.

Yours sincerely,

Glenn Strong
(Chairman)