

NB Lookup	NB	National Body Priority	MI Topic	MI Theme	NB Comment
AU-0003	Australia	Must Fix	General	Generic	<p>In Australia and New Zealand government archival authorities have responsibility for preserving access to records of Australian Governments over the very long term, irrespective of the format of those records. Such archives are preserved for a wide range of government, social, legal and cultural purposes. Particular concerns arise with the preservation of digital formats. These include issues about the intellectual property constraints on and the technical sustainability of digital data formats. Failure to adopt effective measures for the preservation of digital materials poses significant risks to the national cultural, social and government administration values of Australian society.</p> <p>In Australia and New Zealand the archival approach to digital preservation that is followed by the National and State government archival authorities is founded on a strategy of migrating records from their original formats to formats based on open standards that have better prospects for enabling the records to remain useable over very long periods. Effective implementation of this digital preservation strategy requires the adoption of standards that foster the ready and practical development of rendering tools to ensure that digital records can be made accessible and useable. The OOXML specification as currently drafted remains dependent on proprietary implementations to a significant degree, has IP licensing arrangements that are not standard and that apparently impose significant constraints on use, and poses a considerable degree of implementation complexity. Formats based on such a standard are not likely to be viable for the purposes of preserving access to and use of digital records over the very long term.</p>
AU-0005	Australia	Must Fix	General	Organization	<p>Some reviewers found the size and organization of the draft difficult. It would be burdensome for maintenance for the current organization to continue.</p> <p>To encourage maintenance, a split standard would make it easier for working groups and task forces of experts in each field.</p> <p>DIS 29500 is too large, especially part 4, and it contains too much tutorial material. While this material is useful for users, it is burdensome for adequate review, printing and maintenance.</p> <p>VML is deprecated in the DIS and should be removed to its own part or annex.</p> <p>The large size of Part 4 will be difficult for paper versions of the standard, but also makes the electronic version difficult (the PDF links from the TOC do not have sufficient grain to locate clauses.)</p>

					<p>Conformance and requirements as drafted are unacceptable. This can be corrected. The important word “shall” is defined in Part 1 in a way that accords with ISO Directives Part 1. However, the word “shall” is not used in this specification according to this definition, especially in Part 4. In multiple cases, “shall” is used for optional or even deprecated functionality. For example, in Part 4, s2.15.3 Compatability Settings and its subclauses. Furthermore, Part 1 s2.4 and s2.5 specify that conformance is purely syntactic, which contradicts the definition of “shall” in part 1.2 which speaks of ‘behave’.</p> <p>Some reviewers found the conformance issues unclear, for example with regard to Part 1 s2.15.3 and subclauses.</p> <p>To encourage maintenance, we strongly urge option 1) is adopted. However, we are aware that this requires review of over six thousand uses of “shall”, consequently we suggest that adopting options 2) and 3) should be adopted even if option 1) is not adopted.</p>
AU-0007	Australia	Must Fix	General	Editorial	
					<p>There is a security issue that the OPC relationships mechanism allows a kind of obfuscation that can hide virus or malware or unexpected objects from casual view and detection.. In particular, this is where objects with a .bin extension can be renamed to any other extension, such as .jpg or .txt, and potentially passed through a production process undetected.</p> <p>However, DIS29600 does not specify a macro mechanism or Active X controls. Consequently it is difficult to add extra protection.</p>
AU-0009	Australia	Must Fix	OPC	OPC	
AU-0011	Australia	Must Fix	SpreadsheetML	Formulas	The syntax of formulas is inadequately described.
AU-0015	Australia	Must Fix	WordprocessingM	Using Existing Standards	This data type does not accord with the ISO standard for languages, or with common practise for interchange formats.
AU-0016	Australia	Must Fix	SpreadsheetML	Dates	The potential use of different date bases, which has a more generalized mechanism in by ODF, combined with the well-known leap-year problem with the 1900 base, means that dates before 1904 are not reliablly interchangeable.
AU-0017	Australia	Must Fix	SpreadsheetML	Dates	This data type does not accord with the ISO standard for languages, or with common practise for interchange formats.

					<p>This datatype allows characters that are not allowed in XML markup to be represented. These primarily include are control characters.</p> <p>While this might be a reasonable technique for encoding binary data, as an alternative to XML Schema's Bin16 and Bin64 encodings, an examination of the elements which are defined using this datatype shows many if not all are simple strings, such as author name.</p> <p>As a consequence, this datatype is highly undesirable and bad practise.</p> <p>In the particular case where a data field is basically textual however it may be generated by a system that does not follow XML conventions, then this data type may be used.</p>
AU-0023	Australia	Must Fix	SpreadsheetML	Escaped Strings	
					<p>The following individual technical comments illustrate reasons why a student assessment may not be treated fairly and equitably as a result of a failure to address technical errors in ISO/IEC DIS 29500.</p> <p>While there are many possible examples that could be used, consider a student submitting a Spreadsheet for an assessable task that relies on various ISO/IEC DIS 29500 formula functions noted below.</p> <p>Unless they are corrected by ISO, these errors (or unspecified elements) could lead to inequity in student assessment.</p>
AU-0024	Australia	Must Fix	SpreadsheetML	Formulas	
AU-0025	Australia	Must Fix	SpreadsheetML	Formulas	Trigonometric function which fails to specify which units are used for angles (degrees or radians)
AU-0026	Australia	Must Fix	SpreadsheetML	Formulas	Incorrect formula for Average Deviation function
AU-0027	Australia	Must Fix	SpreadsheetML	Formulas	Confidence function incorrectly assumes normal distribution, rather than specifying the type of distribution.
AU-0028	Australia	Must Fix	SpreadsheetML	Formulas	Convert function assumes particular measurements (eg, cup = 8oz/240ml); whereas other countries have alternative measurement (Aust cup = 250ml, UK = 285ml).
AU-0029	Australia	Must Fix	SpreadsheetML	Formulas	Text instruction gives incorrect formula description ("where x is the sample mean" instead of "where x-bar is the sample mean"), which would lead to incorrect calculations if used. This problem applies to 8 other statistical functions.
AU-0030	Australia	Must Fix	SpreadsheetML	Formulas	CEILING function based on incorrect formula, gives incorrect answers (eg, CEILING (-4.5) = -4, not -5 as incorrectly calculated by ISO/IEC DIS 29500). Also, CEILING provides incorrect help text
AU-0006	Australia		General	References	<p>The treatment and completeness of references in the draft is unacceptable, This can be corrected.</p> <p>Furthermore, it appears that several times there are numbers or codes used without explanation of their provenance.</p>

AU-0008	Australia		OPC	OPC	<p>DIS 29500 currently allows applications to arbitrarily move and rename parts, providing the correct relationships are kept. However, this works against documents which are OPC-compliant and also contain data formats that do not use the OPC relationships system but hardcode locations.</p> <p>For example, an OPC file that contains various JPEG images together with an HTML file that uses those images and the equivalent Open XML file. If the Open XML application renames the images, the HTML file will be out-of-date.</p>
AU-0010	Australia		OPC	Markup Compatibility	<p>The meaning of para 2 is unclear. What is “ignored content” in this context. It is strongly desired that any requirements in the specification which causes renaming and removal of parts be made user- and application- optional.</p>
AU-0012	Australia		General	Schema Fragments	<p>The repetition of complex type declarations in Part 4 increases the size of the specification unnecessarily.</p> <p>Furthermore, though well-intentioned, its usefulness for reducing the work in reading the specification is dubious because many of the complex type declarations themselves reference other complex type declarations which are not present.</p>
AU-0018	Australia		DrawingML	Coordinate System	<p>The use of a fixed coordinate system that allows exact integer division of inches and centimetres is long established practise in typesetting systems. For example, gruff and PostScript. The English Metric Units of DrawingML is an example of this.</p> <p>However, it is inappropriate that common dimensions cannot be used, and adds an unnecessary burden on the user (i.e. the developer).</p>
AU-0019	Australia		SpreadsheetML	Bibliography	<p>There is no reason to arbitrarily restrict the sizes of bibliographic fields.</p> <p>Furthermore, the term “character” is difficult: are Unicode characters meant, or database “characters” which often relate to bytes?</p>
AU-0020	Australia		WordprocessingM	Compatibility Settings	<p>The usage of “ignorable” in Part 4, s2.15.3 is problematic, since it suggests some unexplained hierarchy: presumably it means that these elements are ignored by Office 2007 or that some typical Word Processor would not be expected to implement them</p>

AU-0021	Australia		WordprocessingM	Page Borders	<p>It is inappropriate to have a fixed list of values, both because it is unnecessarily product-specific and because it creates a maintenance problem.</p> <p>Furthermore, there appears to be a conflict between the schemas, which specific a closed (enumerated) list, and the text which mentions “possible enumerated values”. So it seems that the intent may have been to have an open list. In other similar cases in the same Part, string types are used rather than an enumeration, so this seems to be a mistake.</p> <p>Furthermore, it is appropriate for information of this kind to be separated into an annex.</p>
AU-0001	Australia		General	Generic	<p>Australia abstains from this ballot, however wishes to provide the following comments as a contribution.</p> <p>We have abstained from voting as a result of a lack of clear consensus in Australia on this issue, and the lack of a nationally representative technical committee in this area.</p>
AU-0002	Australia		General	IP	<p>ISO and IEC need to ensure all appropriate intellectual property declarations are followed and that any material referenced in the document is appropriately available to users of the document.</p>
AU-0004	Australia		General	Title	<p>Where there are multiple standards in the same space, they should clearly indicate their different application area. Some reviewers report the name causes confusion.</p> <p>Some reviewers report that it is important not to differentiate the goals, development method and scope of DIS 29500 Office Open XML with that of IS 26300 ODF in particular. The current name “Office Open XML” is confusing, with ISO Open Document Format (ODF), ISO Office Document Architecture (ODA) and the many various products, notable “Open Office”. Public usage has evolved into “OOXML” and “Open XML” as shorthands.</p> <p>Furthermore, the name may appear to indicate a (non-standard) dialect of XML rather than a use of XML, which would be regrettable.</p> <p>However, because “Office Open XML” is the title of Ecma 376 and in products, it is not suitable to change the name of the technology. A change in the name of the proposed Standard will suffice.</p>

AU-0013	Australia		WordprocessingM	Using Existing Standards	<p>Through this clause and its sub-clauses, the relationship with ISO/IEC 9541-4: Information technology - Font information interchange - Part 4: Open Font Format (dual numbered as IS 14496-22) is not adequately clear. Presumably this is because IS 14496-22 was not published until after Ecma 376 was complete.</p> <p>In particular this concerns IS 9541-1 s4.1.7 OS/2 – Global Font Information Table. Some reviewers missed that the hexadecimal values in 2.8.2.16 were standard values, and had unnecessary concerns about the use of hexadecimal numbers, in this case.</p>
AU-0014	Australia		WordprocessingM	Using Existing Standards	<p>The relationship between Part 4 s2.8.2.2 and other standards should be clarified. Furthermore, IS 29300 matches fonts based on their IANA name, as may be more suited for non-Open Font fonts, such as fonts on Linux.</p> <p>Some reviewers made general comments on the desirability of removing any platform dependencies. Even though Open Font is a standard and Open Type is available on all major platforms, there are some systems, such as Linux systems, where many fonts may use pre-Unicode conventions such as the name of the charset.</p>
AU-0022	Australia		SpreadsheetML	Table Styles	<p>The phrasing of this section is unclear, and there appears to be conformance requirements that go against the “purely syntactic” requirement of Part 1.</p> <p>Furthermore, it is appropriate for information of this kind to be separated into an annex.</p>