DOCUMENT ACCOMPANYING THE GREEK VOTE TO
ISO/IEC DIS 29500

Dear Sirs,

The Greek National Body (ELOT, Greece) after intense discussions on the OOXML specification finally decided to approve the draft version of ISO/IEC 29500, albeit with extensive comments providing various editorial and technical improvements to the ECMA Standard.

Before presenting these comments, ELOT would like to forward the following **requests** to JTC1/SC34 Chairman and Secretary:

   a. ELOT requests that a ballot resolution group be setup, independently of the result of the voting procedure for ISO/IEC DIS 29500.
   b. The ballot resolution group must be mandated by SC34 to discuss all the comments received during the voting period, independently of the source of the comment (e.g. comments accompanying approval votes should be treated equally to comments accompanying disapproval votes).
   c. ELOT would like to be notified about the structure, meeting date(s), location, Convener, and Project Editor of this ballot resolution group.

   ELOT would like to appoint a delegate to the ballot resolution group.

General comments, accompanying the Greek Vote:

After intense discussions, we decided to give, through the portion of the decision that belongs to our vote, the proposed Standard a chance to exist.

This position MUST not be interpreted as a blank check for the text of the Standard. Indeed, we believe that there are numerous areas (especially because it is an immense document) were improvements are necessary to make the document a truly open and useful one for end-users and developers.

Apart from the normal comments, either technical or editorial, that are presented in the attached annex, we would like to draw your attention to two issues, which have dominated our discussions.

1. Patents and Patent policy.

We do not think that comments should address only the text of the Standard itself. This important document will be given to end-users and implementers and they may find themselves tied to various patents, and property rights owned by the company that proposes this Standard.

While Microsoft, the originator of the document, has promised not to sue implementers of the specification (and this may reflect a good intention of the originator), a large fraction of it is nevertheless covered by patents owned by Microsoft. Since Microsoft still holds these patents and has not done anything to make them legally invalid for Open Source use, it is unclear whether this promise is trustworthy. It is at least not

trustworthy enough to build a business on. More than that, Microsoft made its promise on the OOXML version 1.0, leaving anything possible for any future version that may follow in a short time.

Proposal: Following the patents policy of ISO, together with the expressed intention of Microsoft, a full and clear statement must be issued by Microsoft, according to the ISO procedures, infringing on the affected patents, or even the entire OOXML implementation, under a free reusable license, such as the Lesser GPL (LGPL). This gives implementers the irrevocable right to implement the OOXML specification. As an alternative, Microsoft should offer officially, through ISO, a patent promise, that unambiguously permits open source use, and unambiguously covers the present and all future versions of OOXML.

2. Correction of inaccuracies.

It can not be accepted that in the name of backwards compatibility, inaccuracies like those dealing with the 1900 dates, may be allowed to exist in the Standard. There should be provisions to correct them.

Details and proposals for correction are given in specific comments, in the attached annex.

These two general comments have to be addressed before the finalization of the Standard. In an attached annex, we present much more comments, derived from national experts. We count on the Ballot Resolution Group to address all these comments. If the Ballot Resolution Group fails to resolve satisfactorily the issues, then ELOT will reconsider its position and may cast a vote of disapproval during the BRG meeting(s) according to article 13.8 of the JTC1 directives, or may even appeal to the final adoption of the Standard.

Best regards,

Evangelos E. Melagrakis
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