

4 November 2004

Mr. Pedro Ortun
Director for Services, Tourism, New Technologies
and Design Industries
DG Enterprise
European Commission
B-1049 Brussels
BELGIUM

Dear Mr. Ortun,

IBM welcomes the 25 May 2004 recommendations of the IDA Telematics Between Administrations Committee on open document formats for public administrations. As a major purchaser of information technology equipment, software and services, public administrations have an important role to play in further building marketplace demand for open document formats.

Through various industry associations and in concert with other ICT providers in Europe, IBM has engaged with representatives of the Commission and specifically with the IDA unit in support of efforts to promote interoperability in e-government applications.

IBM is deeply committed to working with governments to promote open computing based on open standards. We believe such standards should be developed by formal standards bodies or through ad-hoc industry groups. Such technologies should be published without restriction (other than reasonable royalties for essential patents) and freely available for adoption by industry. Multiple offerings that implement the technology must be available in the marketplace for this to be real.

We believe it is important that public administrations in Europe and elsewhere insist on compliance with industry supported, open standards for key technologies in public sector procurements where such open standards exist. We welcome public policy statements to this effect in numerous European countries and recommend that measures be taken to ensure that overarching policies in support of open standards are reflected in individual requests for tender.

These principles are particularly relevant for e-government applications with respect to the creation, manipulation and exchange of documents within public administrations, as well as between such administrations and citizens. Public administrations are driven to use a select number of common file formats by their need to share and maintain the fidelity of their documents. It is essential that public sector documents be available in a commonly used open file format so as to avoid use

of closed, proprietary formats which result in “vendor lock-in” and the imposition of a single technology choice on citizens, enterprises and other organisations seeking to exchange documents with public administrations.

The ongoing work on open file formats in OASIS is an excellent step forward in efforts to develop a file format which meets the requirements outlined above. IBM follows closely the activities of the Open Office XML Format Technical Committee in OASIS and has informed OASIS that we intend to join the relevant technical committee. Indeed, we already offer products (IBM Workplace Client Technology) which conform with the current draft specifications developed within the OASIS TC.

IDA’s 25 May 2004 recommendations deserve industry and marketplace support. We welcome this initiative and hope it will be successful in building further industry and user support for open file formats.

Sincerely,

A handwritten signature in black ink on a light gray rectangular background. The signature is written in a cursive style and reads "Karla Norsworthy".

Karla Norsworthy
Vice President, Software Standards