

September 8, 2005

Mr. Peter J. Quinn
Director, Information Technology Division
& Chief Information Officer
The Commonwealth of Massachusetts

Dear Mr. Quinn:

Adobe Systems, Inc. would like to comment on the proposed Enterprise Technical Reference Model v.3.5., specifically, on ITD's designation of PDF as an acceptable format. We would like to note that PDF has moved beyond *de facto* specification status and has achieved formal status as an international open standard. The International Standards Organization (ISO) has to date ratified two standards based on the PDF specification. PDF/A (ISO 19005-1) is for long term document preservation and archiving, and PDF/X (ISO 15930-1) is for the reliable exchange of press-ready, high end graphic information that facilitates the exchange of, among other things, high-end color advertisements.

Also of interest to ITD are PDF standards currently in development under the auspices of an international standards developer, AIIM, the enterprise content management association. These are PDF/UA, a specification defining the accessible characteristics which will ensure individuals with disabilities can access PDF files; and PDF/E a standard for the reliable exchange of engineering documentation using the PDF file format. Under AIIM sponsorship, these standards are currently in the ISO working group phase.

Thousands of PDF implementations exist, both open source and commercial, and no other specification is deployed on as many hardware platforms, operating systems, and applications, including OpenOffice applications. PDF has become so pervasive precisely because the format is based upon an open and published specification.

Adobe also respectfully questions the implications of three statements in the Enterprise Technical Reference Model v 3.5:

1. The second paragraph in the Description section under Other Acceptable Formats states that "The acceptable formats identified below (PDF) do not address all data types. Future versions of the ETRM will address acceptable formats for maps, graphics, video and audio data." In fact, PDF in some implementations is ideal for securely preserving these other data types. The Commonwealth is proposing to deny itself the benefit of PDF's ability to render these data types.

2. The opening paragraph in the section on “Other Acceptable Formats” states that such formats “while not affirmed by a standards body, achieve the other criteria of openness and *are acceptable at this time.*” (*Italics added*) What, if any, are the implications of the words “at this time?” Need Adobe be concerned about PDF losing its acceptable format status in the future? What might trigger such a reassessment?
3. The proposal’s guidelines for using PDF state that, “the PDF format may be used for documents whose content and structure will not undergo further modifications and need to be preserved.” This sentence appears to limit the range of uses for which PDF would be allowed. Such a limitation would deny Massachusetts government of substantial functionality that Adobe and other software suppliers offer in their PDF implementations, such as forms processing, digital signature capabilities, commenting, and authentication. Does ITD really intend to limit PDF functionality this way?

Finally, under the Standards and Specifications heading of the section addressing the Portable Document Format, the ITD establishes version 1.5 as the baseline specification for PDF files. We would instead recommend that ITD establish version 1.6 as the baseline. This would allow the Commonwealth to be harmonized with the internationally established PDF standards.

Thank you for considering Adobe’s feedback and questions about the proposed Enterprise Technical Reference Model, v.3.5. We look forward to further discussions.

Sincerely,

Shantanu Narayen
President and Chief Operating Officer