

From: Navarro, Peter (TRE)
Sent: Thursday, August 25, 2005 1:03 PM
To: Boldman, Claudia (ITD)
Cc: Phillips, Victoria (ITD); Maloney, Philip (TRE)
Subject: Re: New Standards for Data Formats

Looks good. The migration strategy will be important. I am sure agencies will ask about training. Will HRD be ready to provide training to state employees for OpenOffice.org or other applications that support OpenDocument? Many users will end up with 2 office suites for while - probably not a problem. We are planning to start phasing in OpenOffice.org when version 2.0 final is released - starting with IT staff of course.

As was starting to be discussed in the ITAB meetings, the biggest issue may be interoperability with those that still use the defacto standard of MS Office. Another issue may be conversion of older documents - should it be done or should only newly created/modified documents use OpenDocument? And what happens when a document is converted? There will effectively be 2 versions (e.g. mydoc.doc and mydoc.odt). Should the older .doc version be deleted? If the document is shared and another user uses Word then that person will open the .doc version. All part of migration issues.

From: Dr Tony Young [hygrocyb@bigpond.net.au]
Sent: Wednesday, August 31, 2005 11:41 PM
To: Standards (ITD)
Subject: Your decision to move to Standard file formats

Dear Sir,

I am an Australian and I have been watching the moves to open/standardised file formats by the state of Massachussetts very closely. I heartily congratulate you on your move to select OASIS OpenDoc XML as a standard file format, together with the other aspects of common file standards.

The ramifications of your move are enormous because you are pioneering the move to international file standards for other American states and the advantages you gain will be very readily perceived by them as well. I have no doubt this is just the start of an enormous revolution in the USA to move away from proprietary formats to standardised file formats that are readily exchangeable with any computer. It is also of great pleasure to me to see that you have implicitly recognised the dangers that proprietary file formats hold with respect to public document access.

Very well done and I will be watching your progress with great interest and pleasure.

My sincere good wishes

Dr Tony Young

--

Dr Tony Young
100 Langton Road
Blackbutt Qld 4306

Australia
ph (07) 4163 0395
fax as above

"To mess up a Linux PC,
you need to work at it;
To mess up your Windows PC,
you just need to work on it."
Scott Granneman

From: Ilari Salminen [ilari.salminen@gmail.com]

Sent: Thursday, September 01, 2005 2:18 AM
To: Standards (ITD)
Subject: Comments on Information Domain - Enterprise Technical Reference
Model v.3.5

Formal greeting to you, Ma'am/Sir
(depending on who's actually reading this message)

I must commend you on your endorsement of open standards. Very few non-technical people really understand the significance of real standards (as opposed to proprietary "standards") and standards compliance in general. This is certainly a huge step in the right direction. Hopefully, other states (and countries) will follow your example swiftly.

I am not a Mass. resident myself, nor am I even from the US; I am from Tampere, Finland. Regardless, I found myself compelled to write this short comment solely because of the importance of this matter.

Kind regards,
Ilari Salminen

From: Brian J Berrigan [bberrign@renc.igs.net]

Sent: Thursday, September 01, 2005 2:12 AM
To: Standards (ITD)
Subject: Bravo for Your Statesmanship re Open Standards

I wish to applaud your willingness to listen to consumers and your openness in discussing ways to end the stranglehold of proprietary software standards. Let us hope your leadership is emulated by many more government bodies. Thank you, B Berrigan.

From: Leon Brooks [leon@cyberknights.com.au]

Sent: Thursday, September 01, 2005 4:07 AM
To: Standards (ITD)

Subject: Thank you for electing to use a truly open document format

Every significant organisation which does this holds the door open to some degree for the next one. When we're all using standards-compliant open documents, interchange, search, archival and many other things become relatively simple and easy.

Cheers; Leon

--

<http://cyberknights.com.au/> Modern tools; traditional dedication
<http://plug.linux.org.au/> Member, Perth Linux User Group
<http://slpwa.asn.au/> Member, Linux Professionals WA
<http://osia.net.au/> Member, Open Source Industry Australia
<http://linux.org.au/> Member, Linux Australia

From: Kevin Wright [kwright68@gmail.com]

Sent: Thursday, September 01, 2005 9:36 AM

To: Standards (ITD)

Subject: Open standards

I applaud your decision to use open standards for public documents. The appropriate use of text, HTML, PDF, and OpenDocument will ensure access to all public documents and reduce the interoperability problems that have caused problems in the past.

From: Christopher Heiny [clheiny@starband.net]

Sent: Thursday, September 01, 2005 10:12 AM

To: Standards (ITD)

Subject: Open document format standard

Hello,

Although I am not a Massachusetts resident, I support the recent version of the proposal to adopt open document standards for state documents.

I hope that this will encourage the states I deal with regularly (New York and Colorado) to adopt the same standard, which would greatly simplify my dealings with their government agencies.

Thank you,
Christopher Heiny
1021 Hopkins Gulch Road
Boulder Creek, CA 95006

From: Ryan Bradley Norman [rbnorman@WPI.EDU]

Sent: Thursday, September 01, 2005 10:31 AM

To: Standards (ITD)
Subject: Open Standard and Open Source Resources

I would like to voice my support for the migration of our State's documents to an open source standard. I think it is a very good move that in the future will prove its wisdom. There exists a possibility in the future that microsoft products will not be available for all people and I truly believe in the importance of every citizens right to have access to government documents electronically. I applaud this bold move and look forward to seeing the incorporation of more open source software into our state government.

Sincerely,
Ryan Norman
87 Park Ave
#11
Worcester, MA 01605

From: Timothy LeBlanc [timothy.leblanc@gmail.com]
Sent: Thursday, September 01, 2005 10:31 AM
To: Standards (ITD)
Subject: OpenDocument the Standard File Format for the Commonwealth
PR: MassGov Declares OpenDocument the Standard File Format for the Commonwealth

This is terrific news for open standards! Like the European Union before them, Massachusetts has chosen a good open format for documents to be used in the years to come.

I for one expect my government to protect my freedom, and the Commonwealth of Massachusetts has demonstrated today they are up to the challenge.

Proud to be a Massachusetts resident!

Timothy LeBlanc

From: Brian Crouse [bcrouse@gmail.com]
Sent: Thursday, September 01, 2005 11:31 AM
To: Standards (ITD)
Subject: Comments on Information Domain - Enterprise Technical Reference Model

I strongly support the Information Domain - Enterprise Technical Reference Model v 3.5.

This is the sort of enlightened, forward-looking, and competent government policy that makes me proud to be a resident of Massachusetts.

Regards,

Brian Crouse
Concord, MA

From: Chris Cobb [christopher.cobb@wfinet.com]
Sent: Thursday, September 01, 2005 11:41 AM
To: Standards (ITD)
Subject: THANK YOU (re: OASIS format)

Re: OASIS document format

I am not currently a Massachusetts resident (although I formerly lived in Boston), but I would like to thank you on behalf of all non-Massachusetts citizens for the stand you are taking in standardizing office document formats on an open standard.

Your bold step on this issue is sure to encourage others to follow. Especially when they see how much money you are saving on software licenses.

THANK YOU!

Christopher Cobb
Virginia resident (formerly a Boston resident)

From: Alex Perry [alex.perry@ieee.org]
Sent: Thursday, September 01, 2005 12:04 PM
To: Standards (ITD)
Subject: Feedback, as requested

These comments reflect a quick reading of ETRM v3.5 from the point of view of a small business contractor considering the possibility of responding to future RFPs and other procurement solicitations. Areas of the document not commented upon below are not ignored; rather they are felt to be relevant and suitable for your purpose.

Thus, statements reflecting agreement with successive sections' goals and methods should be assumed present - omitted for brevity.

Page 2 - Roadmap - I recommend two more bullets:

Current State * Data migration between agencies is non-trivial or even impossible if no single vendor has rights to specifications and reference implementations of both source and destination formats simultaneously.

Target State * All tools procurement for data migration can easily be let for competitive procurement since any vendor has access to the specifications and working

reference software for any data format.

Page 18 - Migration to open document formats - Migration:

To ensure continuity of office document data across the migration, for all proprietary save formats used after January 1 2006, there must be an automatic translation filter in routine use that captures the functionally essential elements of that save format and generates an open format that can meet critical needs.

In most cases, the font, layout or neatness are not critical so that the generated open format could be plain text or HTML.

If the filter fails to capture all the essential elements,

- (1) the application can be withdrawn from use sooner than end 2006,
- (2) the translation filter can be extended to capture more detail, or
- (3) the users can be trained to use the application differently.

Page 19 - Technology spec - Plain Text or HTML:

Manual saving from within the application, as described here, is distinct from the automatic translation by a separate filter, as described above, because the application has full understanding of its own format and can generate a higher quality open format.

In contrast, the automatic filter may yield a lower quality result but has the benefit that it can be applied to thousands of existing archived document files without manual intervention.

Hope this helps,
Alex.

From: David Black [david.black@magnalynx.com]
Sent: Thursday, September 01, 2005 12:24 PM
To: Standards (ITD)
Subject: comment on Information Domain - Enterprise Technical Reference Model v.3.5

Hello -

I'm emailing to applaud and acknowledge the State of Massachusetts' recommended selection of the OASIS document format, along with other available open document formats, as a basis for the State's document authoring and document interchange needs going forward in 2007.

At MagnaLynx, in 2003 we selected OpenOffice.org as the corporate standard tool to produce and read text and spreadsheet documents, and have been highly satisfied with the degree of functionality, cost/performance, control of ongoing licensing and software maintenance expenses, and inherent protection from obsolescence afforded to the well-documented formats it produces. Not to say that OpenOffice.org is perfect and without problems, but the software substantially has improved even across minor revisions, and the developers have consistently been responsive to bug reports and other correspondence - definitely competitive with or even exceeding my considerable experience with similar support requests made of proprietary software vendors.

My hope is more States and branches of our government, as well as corporations, similarly recognize

these important benefits to open formats in document production and interchange, and make similarly well-considered decisions in the near future. By all means, proceed forward with your plans!

Best regards,

Mr. David L. Black
Chief Information Officer
MagnaLynx, Inc.

From: Ed Holden [ed@edholden.com]
Sent: Thursday, September 01, 2005 12:52 PM
To: Standards (ITD)
Subject: Thank you

I'd like to express my thanks for pushing ahead with the Commonwealth's open standards initiative. Choosing the OpenDocument v 1.0 standard (as well as PDF, HTML and plain text) as the official document format for all the Commonwealth's data is a good move that opens the government to competition from multiple vendors. Many will try to paint this move as a move against Microsoft, but in fact Microsoft can and should engineer their Word application to support OpenDocument. And they could do it with minimal effort - far less effort than would be required for other vendors to adhere to Microsoft's patent-encumbered formats. Thanks for thinking about the long-term viability of document standards, and as a resident of Massachusetts I hope to see this initiative continue in this direction.

Regards,
Ed Holden
Medford, MA

:: Ed Holden
:: ed@edholden.com

"Don't blame me, I voted for Kodos."

--

<http://www.fastmail.fm> - Access your email from home and the web

From: David A. Wheeler [dwheeler@ida.org]
Sent: Thursday, September 01, 2005 1:20 PM
To: Standards (ITD)
Subject: Enterprise IT architecture - OpenDocument format

I noticed that version 3.5 of the Enterprise IT architecture includes a requirement for the OASIS "OpenDocument".

I think OpenDocument is the right decision, but you might want to consider breaking down your

implementation timetable into multiple stages with multiple target dates, as I discuss below, to make sure that your implementation succeeds.

POINT 1: OpenDocument is the right decision.

First, I want to commend you for making this choice of OpenDocument, which is in many senses the obvious choice:

- * The world has been clamoring for a single, XML-based data format for office documents, so that the advantages of XML (e.g., easy processing, flexibility, and interoperability) would be available for office documents.
- * OpenDocument has been developed and is maintained by a vendor-neutral body.
- * Most vendors have worked together to create this specification.
- * There are now multiple implementations, which is the best way to ensure that specification actually provides interoperability (the IETF even requires this for its standards).
- * Some implementations are available at no cost & have a licensing structure that allows that to continue indefinitely. This greatly reduces transition costs by ensuring that competing implementations will be affordable.
- * Support is already available for this format.

There's only one "competitor" I'm aware of for storing office data in an XML-based format, Microsoft's, and that specification is fundamentally disqualified as an interoperability standard:

- * it cannot be routinely implemented for both reading and writing by any supplier. In particular, open source software projects using the most common license, the GNU GPL, cannot read and write them; such projects are now critically important in the marketplace, and permanent exclusion of them is contrary to Massachusetts' interests.
- * it is controlled by a single vendor, not a vendor-neutral body.
- * it was not developed in consultation with many alternative suppliers.
- * it's too late; the world is already switching to OpenDocument, and now that everyone else has invested in OpenDocument and has it working, there's now no real incentive to use an alternative. Especially since Microsoft's approach will probably require a massive amount of rework to even become useful as interoperability standard; it wasn't developed in consultation with others, so there would probably need to be years of effort before it caught up to where OpenDocument already is. Even if Microsoft fixed its licensing problems, it appears unlikely that anyone will care now. Microsoft gambled that everyone would just use whatever format they created, no matter what its ramifications, and it appears that they've lost the bet. The same thing happened in VHS vs. Betamax; Sony thought everyone would use Betamax, just because Sony created it; other vendors chose VHS, in part because it was a more open specification, and Betamax quickly died in the market. Even big organizations sometimes lose in the market.

There are, of course, the existing Microsoft Office formats, but as a long-term retainer of data they

have shown themselves to be ineffective. I myself have several important documents stored in older Microsoft Office formats that Microsoft Office can no longer really read. Their lack of specification and their being tied to a single vendor has resulted in rapid data loss across all governments. Switching to a well-specified, vendor-neutral standard simply makes sense, before Massachusetts loses even more data.

Thus, at this time it appears that OpenDocument is the wisest and lowest-risk long-term decision. Old Microsoft Office format is unspecified and will cause continuing data loss, while failing to take advantage of XML technology, while Microsoft's XML format will prevent instead of help interoperability. By announcing the goal early, you'll make it easier to achieve, because that gives people time to plan that transition. It also appears that many other governments (including European governments) are coming to the same conclusion, for all the same reasons.

POINT 2: TIMETABLE

However, I do have some concerns that your January 1, 2007 deadline may be too difficult to meet at the level you discuss.

As you note in your document, you have a large deployed legacy base.

They cannot stay indefinitely with the current tools, but it will be difficult to change them all with only a little more than a years' time. Office suite deployments are often rolled in slowly, (over a period of years) even when the changes are minor, because of the number of people involved.

The right solution is not to delay a decision, or "put off" transition efforts to a long indefinite future. That will continue the current problems, and it will not prepare Massachusetts for the future.

Instead, identify multiple stages, with timetables, and a plan for achieving each stage. In particular, you should make sure that READERS are WIDESPREAD -- native or not -- before beginning to WRITE and DISTRIBUTE files in this format as a widespread norm.

Here is an example of stages, that you may find useful:

- * All new office suites acquired must support reading and writing this format, either "natively" or via a plug-in. You can probably require this even BEFORE January 1, 2007; certainly by mid-year 2006 this should be a feasible requirement. For example, you could install any new office suite along with a separate (possibly non-native) plug-in. If necessary, you could even split this further into two parts: being able to read (first), and later being able to both read and write.
- * All writeable office documents provided the public via a website must include this format as one of the formats. Note that a webmaster might do this conversion instead of the original author. Again, this could probably be done by mid-year 2006 (or even earlier if you really pressed it.). This would gain visibility of the format.
- * A simple method for installing plug-ins for common legacy office suites has been selected/developed. Since there are freely-available existing

tools that can do the translation, this is probably already available, but evaluating them, and addressing any concerns, ahead-of-time would help.

- * A majority of office suite users have some method for reading this format, e.g., via a plug-in or by using a separate tool to read the format. After all, many just read documents, not generate them, and it will be easier to gain acceptance of the new format if writers know that most people can read them. Widespread ability to read the format will reduce the risks once people start sending them out. This may involve in some cases having two office suites installed (e.g., one of the freely-available office suites to read files in the new format) or a non-native plug-in. This is a common way to reduce risk in a transition period: have both the old and new available.
- * All new office suites acquired must support reading & writing this format, natively {current version of the architecture, part 1}. This may be able to stay at January 1, 2007, though it's ambitious.
- * All new office suites acquired must support reading & writing this format, natively, and be configured to save using these formats by default {current version of the architecture, part 2}. This may need to wait until mid-year 2007. You can't do this until most readers will be able to read this format, and that might not be achieved by January 1, 2007.
- * The majority of writeable office documents provided the public via website must be ONLY in this format. The goal here is to eliminate constant translation work, and encourage laggards to transition.

I hope that you have some sort of plan for distributing tools to allow reading and writing this format for your circumstances.

If not, create one; rolling out any change (even a very good one) requires planning.

POSTSCRIPT

I have no financial interest in your choice of format.

You should certainly listen to all vendors, but I suggest that you consider advice from any biased vendor with a large grain of salt.

Please continue to make choices that are in the long-term best interests of the Commonwealth and its citizens, as I can see you are already doing.

Thank you for your time. I speak as a citizen, not for my company.

--- David A. Wheeler

From: Joyce Lauer [juniperus_communis@yahoo.com]
Sent: Thursday, September 01, 2005 1:50 PM
To: Standards (ITD)
Subject: Open Formats standard - comment

Comment on Open Formats standard:

I strongly support the proposed standard for use of Open Formats such as TXT and PDF.

Citizens have a right to read government documents, and the documents must be in formats that are accessible to all.

thank you

Joyce Lauer
Wayland, MA 01778

Do You Yahoo!?

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From: Mark Wachtler [MWComputerService@yahoo.com]
Sent: Thursday, September 01, 2005 3:22 PM
To: Standards (ITD)
Subject: Enterprise Technical Reference Model v3.5 Comments

To whom it may concern:

Having read the v3.5 draft of the ETRM, I wished to comment upon the proposed document format changes. I hope you will take this in the spirit of helpfulness in which it is offered.

I feel the specification of XML, and in particular the OASIS OpenDocument Format, is an excellent decision. It will prevent vendor lock-in, and ease any program or operating system transitions that may become desirable. If it is decided that a particular program offers more desirable features (even only for a given branch of government), there will be no requirement to stay with the previous program to ensure that your documents can still be read. As you are aware, even if conversion of documents is possible, it is rarely trivial. I am of the opinion, however, that it is better to convert once to expand possibilities, than to be locked into any program in perpetuity. This is also a reason to avoid any proprietary extensions to open formats, no matter how useful they may look in the short run: they then cease to be open, and can only be read by a small subset (as small as 1) of programs. This, of course, limits your ability to change platforms as and when your needs change.

The specification of OASIS' ODF also enables the possibility of a heterogeneous computing environment between offices without communication problems. Thus, if one office decides that their needs are best served with, say, Sun workstations running Solaris, they are still able to submit documents in the proper format from within that environment (using StarOffice or OpenOffice.org, for example). As an extreme example: if Microsoft's .doc format were used instead, the only platforms usable (without major effort) would be Windows and Macintosh.

The ODF also allows for a wider range of licenses for the office software. This means that if you decide to save on acquisition costs by using GPL- or BSD-licensed software, or if you decide they offer a more desirable set of features, there are no issues between the format license and the program license.

On the subject of ASCII text files, there is little to be said: they are nearly universal. As mentioned in the draft, they cannot contain formatting codes. Also, some characters (particularly non-English ones) cannot be coded in ASCII. UTF-8 allows for more characters but is not nearly as widely-readable, so I feel ASCII is the best solution here.

I believe HTML files should be validated, so that they will display consistently across clients. Having designed web pages in the past, I have found that validating them is the easiest consistent way to make sure they display properly across platforms. I would, of course, recommend the W3C's own validator at validator.w3.org

I hope this has been of some use, and I wish you a trouble-free migration to open document standards.

Best Regards,
Mark Wachtler
MWComputerService@yahoo.com
858-205-0954

From: Steven Zakulec [spzakulec@mail.widener.edu]
Sent: Thursday, September 01, 2005 3:32 PM
To: Standards (ITD)
Subject: Comments on Open standards draft

I want to say that the draft is extremely well written and detailed, without being too technical or wordy. I'd also like to thank you for choosing the OASIS OpenDocument standard. This draft is much better than the original draft, and it is apparent (and appreciated) that you took comments seriously.

I am not sure if you have considered funding OpenOffice.org in some way or form. It would be a good way to stimulate development, and could help build a small industry that worked to make useful addons for OpenOffice.org.

Once again I'd just like to say thanks for listening and for a great job on the draft document.

From: Eugenio Pierno [pierno@napolinux.com]
Sent: Thursday, September 01, 2005 3:54 PM
To: Standards (ITD)
Subject: Open Standards: great work

Great work the Reference Model, really.

I appreciate the spirit of innovation and attention for the public good which pervades your work. Sure many more US States will follow along.

I also want to let you know I'm doing my best to help European Government reach the same

conclusions about Open Source and Open Standards.

Best Regards

--

Dr. Eugenio Pierno
Italy

From: Vern Woolford [dantepoe@gmail.com]

Sent: Thursday, September 01, 2005 4:46 PM

To: Standards (ITD)

Subject: OASIS OpenDoc XML

Good day madam/sir,

If I may be so bold, but in a humble manner at that, I should like to express my delight, support, and appreciation of the Commonwealth of Massachusetts's choice of the OASIS OpenDoc XML format for use within office documents. It goes without saying that open standards promote a more efficient means of exchange of information, which in itself should promote open government. Moreover, open formats invite more participation on the part of the individual, the community, business, and government.

I am a proponent of open standards across the board; and I would take this opportunity to urge the Commonwealth to use this initiative to further the efforts of using open standards, as much as would be possible in the interest of the ideas expressed above.

Thanks. Best regards.

Vernon Woolford
Communications Officer
United Nations

From: Brian Peltonen [brian@icosystem.com]

Sent: Thursday, September 01, 2005 5:37 PM

To: Standards (ITD)

Subject: An enthusiastic endoresement of the open format move

As a Massachusetts voter and tax payer, I was very excited to read about the move to require all state documents be stored in an open format. As a citizen, I have worried upon the state requiring the products and assistance of a very few companies--if not one--in order to access and process its information.

I congratulate Massachusetts for taking the lead in what I hope will be a nation wide iniative.

A hearty bravo!

Sincerely,

Brian Peltonen

Complexity Model Developer
Icosystem Corporation
10 Fawcett St
Cambridge MA 02138

From: steven@channel-e.co.uk on behalf of Steven J Lilley
[steven@midgley.demon.co.uk]
Sent: Thursday, September 01, 2005 5:39 PM
To: Standards (ITD)
Subject: Choice of OASIS as a standard

Hi.

I have to mail and say how pleased I am with this decision.

I work in local government here in the UK. I fight so hard for open standards because I sincerely believe that it will provide enormous savings for tax payers. Yet so many times I get stopped before making real progress because the solutions I'm offering aren't Microsoft/Oracle/Sun.

I really do hope it works out over there. I'm already scouring your technical document for ideas that I can use here.

You should be proud for making a difficult decision.

Sincerely

--

Steven J Lilley
Ashes to ashes and dust to dust,
If the women don't get you the whiskey must.
www.channel-e.co.uk

From: Tony Dolan [dolanconnection@mac.com]
Sent: Thursday, September 01, 2005 6:00 PM
To: Standards (ITD)
Subject: Good Work

As a taxpayer, I'm proud that the state is leading the charge to a level technology playing field. I have no doubt the efficiencies and real innovation encouraged by this move will pay off for all of us.

Best,

Tony Dolan

Acton, MA

From: Charles C Bailey [charles.bailey@tufts.edu]
Sent: Thursday, September 01, 2005 7:31 PM
To: Standards (ITD)
Subject: ETERM v3.5 Draft

Dear Drafters of the ETERM,

I've just read your 20 page document following its recent publicity on several internet news sites and I must say that this really gives me great pride to be a Massachusetts resident. Increasingly, information that defines and describes our culture is being archived electronically.

To allow any single private entity to retain control over the terms and conditions with which any of it can be viewed and authored is unthinkable foolish. The State is to be commended for recognizing the value of open formats and safeguarding, for the public, the future of what will one day become our history.

Sincerely,
Charles C Bailey

From: Tim Wysocki [tim@wysockizoo.com]
Sent: Thursday, September 01, 2005 8:51 PM
To: Standards (ITD)
Subject: Open Standards Initiative

Mr. Peter J. Quinn
CIO
Commonwealth of Massachusetts

Dear Sir:

As a resident of Massachusetts I applaud your willingness to support the open source movement in such a very public and dramatic fashion. I too use open source software for desktop publishing and "office"

functionality - specifically OpenOffice 1.9.79. Although I have found some aspects to be especially buggy, I believe it to be a suitable alternative to MS Office for most applications.

I would also encourage the Commonwealth to adopt other open source programs that work especially well; most notably the Firefox browser and Thunderbird e-mail application. I believe that these two products are head and shoulders above comparable MS products like IE 6.0 and Outlook Express.

In closing I respect your willingness to make a decision which is sound but contrary to the current

technological mindset. As a taxpayer, I appreciate the effort to save public monies by investigating low cost (or free) alternatives to high cost brand names.

Tim Wysocki
9 Erlin Rd.
Chelmsford, MA 01824

From: Benjamin Horst [bhorst@mac.com]
Sent: Thursday, September 01, 2005 9:32 PM
To: Standards (ITD)
Subject: A vote of support for the OpenDocument decision

Dear Peter Quinn and team,

As a computer specialist, author, and former happy resident of Massachusetts, I'd like to write and voice my support for your recent decision to standardize on the OpenDocument format.

To my mind, this is the wisest strategic option for reasons which have been frequently cited: long-term access to the data, ease and low cost of the tools citizens need to read government files, the benefits of competition in the marketplace for software tools to read and write these documents, and many others.

Other governments and corporations around the world are beginning to follow the same school of thought, and I imagine many within the USA will soon follow Massachusetts' example.

Thank you for the opportunity to voice my opinion on your decision.

Benjamin Horst
Astoria, NY

From: Sylvia Webb [smwebb@edatasystemsintegration.com]
Sent: Thursday, September 01, 2005 10:56 PM
To: Standards (ITD)
Subject: Open Standards Policy
To Whom it May Concern:

We are a small business with less than 15 employees. We develop software that supports the documentation of eBusiness national and international standards. We have customers in Massachusetts, and internationally. We have chosen the Microsoft platform for all employees. In 2003, we began working with companies who are using Open Source email, word processing and spreadsheet software. In the past year, they have also added browser software from Mozilla and Firefox.

The added costs to our business because these products are not fully compatible with Microsoft products have been extremely costly to us. Additionally, we have incurred thousands of hours of additional costs because our products are blamed for problems that result because of the poor behavior of these "open standards". Support for these open source products has been non-existent at times even

to employees of companies like Sun Microsystems.

We strongly urge the State to consider the serious additional burden that will be placed on everyone who uses Microsoft products BY CHOICE. We fully support open standards WHEN they can be fully integrated without negative impact to taxpayers, vendors, and customers. This simply isn't the case with any of the open source office productivity products.

It is not appropriate for any government to place undue financial burden on the majority of their vendors and customers. Instead, Massachusetts should be allocating a portion of these funds to work with standards bodies to bring these open products into full compatibility. While government may not like it, the majority of people and companies who purchase Office, Lotus, and other commercial products, do so by choice.

Your decisions should be based on reality and not the blue sky theory from technology bigots.

Sincerely,

Sylvia M Webb
President
E-data Systems Integration Company
4422 West 172nd Street, Suite 22
Lawndale, CA 90260-3495
310-370-3410 - Voice
310-370-5614 - Fax

From: J David Eisenberg [catcode@catcode.com]
Sent: Friday, September 02, 2005 12:04 AM
To: Standards (ITD)
Subject: Comments on ETRM Version 3.5 Information Domain

First, I am thrilled to know that you have specified OpenDocument as a standard. This is a good thing.

I am not as pleased to see that you are recommending only XML Schema. I would suggest that you also include Relax NG (<http://www.relaxng.org/>) as a schema language.

From personal experience, I have found that I must constantly have a manual at my side when writing XML Schema. When writing Relax NG, if a construct looks like it ought to work, it almost always does work.

See <http://www.imc.org/ietf-xml-use/mail-archive/msg00217.html> for a detailed comparison that shows why Relax NG is a better choice for a schema language.

I'd also note that the W3C itself uses Relax NG in its specifications for Scalable Vector Graphics (<http://www.w3.org/TR/2004/WD-SVG12-20041027/>) and XHTML 2.0 (<http://www.w3.org/TR/2005/WD-xhtml2-20050527/>).

Finally, a tool named Trang (<http://www.thaiopensource.com/relaxng/trang.html>) is available for translating Relax NG to XML

Schema.

Please consider adding the Relax NG technology to your Reference Model.

--

J. David Eisenberg <http://catcode.com/>

From: khurram [khurram1@gmail.com]
Sent: Friday, September 02, 2005 12:50 AM
To: Standards (ITD)
Subject: Open

I think its great that the formats are being opened. I mean, who needs to keep paying one vendor for their proprietary technology every few years? There is no need for that, especially when the price for MS Office is so high (well, for home users anyways. Schools, and governments do get discounts). I applaud this move by the state of Massachussetts. Simply brilliant.

From: Andriy_Palamarchuk@percussion.com
Sent: Friday, September 02, 2005 9:23 AM
To: Standards (ITD)
Subject: Feedback to "Commonwealth of Massachusetts Enterprise Information Technology Architecture"

Hi,

my name is Andriy Palamarchuk.
I'm a Massachusetts resident, work for Woburn-based company Percussion Software - producer of Content-Management system (CMS), LotusNotes tools.
I'm a enterprise software engineer, have been closely working with XML, databases for many years.

I strongly approve your decision to go with open standards for the state's data. This approach will definitely simplify software development, improve interoperability with third-party products, eliminate vendor lock-in, assure easier access to the state's documentation, reduce costs. Costs of migration are should not be so bad if you consider that you would still have migration, interoperability problems with existing approach.

The standard-based approach strongly enforces the point that state documentation is property of state citizens, not single software company.
This will also drastically reduce cost of accessing state documentation for state residents, help them to eliminate vendor lock-in. Currently a resident needs to buy a software on many hundreds of dollars to be able to read documents in proprietary standard. This includes cost of MS Windows, office suite

licenses.

I use Linux on my home computer. There is no versions of MS Office, Corel Word Perfect, IBM Lotus Notes for Linux.

I'm glad that I will be able to access documents without fear that the documents are reproduced incorrectly.

Standard-based approach will also increase competition. It will enable other companies to create software to manipulate the documents.

I'm about to send request to my management about support for OpenDocument format in Rhythmyx - the CMS we develop, suggest to create tools for LotusNotes integration with OpenDocument, migration from LotusNotes to help initiatives like yours.

You have my complete support in this initiative.
Feel free to contact me if you have any questions.
Andriy Palamarchuk

tel: 781-835-1270

PS: this message reflects my personal beliefs and not the official point of view of my employer.

From: James Treleaven [jamestreleaven2000@yahoo.com]
Sent: Friday, September 02, 2005 9:30 AM
To: Standards (ITD)
Subject: OpenDocument saves taxpayer dollars

Dear Sir/Madam,

I would like to express my strong support for the proposed adoption of OpenDocument as the Commonwealth of Massachusetts standard for office documents.

The OpenDocument standard is the only open standard for office file formats that I know of that has been put forward by an independent standards body.
Furthermore, it is the only Office File Format that I know of that is fully supported as the default file format by more than one office suite (OpenDocument is supported by current or upcoming versions of OpenOffice, StarOffice, and KOffice).

OpenDocument will save Massachusetts taxpayers significant amounts of money in the long term.

Best Regards,
James Treleaven

From: Raj Singh [raj@rajsingh.org]

Sent: Friday, September 02, 2005 10:32 AM

To: Standards (ITD)
Subject: OASIS Open Document Format for Office Applications comment

As someone who does a lot of consulting work with state and federal agencies and has been "forced" to use Microsoft Office to be compatible with present and future clients, I strongly support the proposal to use the OASIS Open Document Format for Office Applications.

thanks,
Raj

From: John D. Leith [jdleith@comcast.net]

Sent: Friday, September 02, 2005 10:51 AM
To: Standards (ITD)
Subject: Open standards, open source

To: Standards@state.ma.us
Date: 2 Sep 2005
From: John D. Leith <jdleith@comcast.net>
Subj: Open standards, open source

Dear Sirs: 2 Sep 2005

I strongly support the adoption by the State of Mass. of the "Open standards, open source" policy and requirements, as reported in the Boston Globe of 2 Sep 2005 on page C1. I have read the draft of the Mass. Info Tech Division, available at: http://www.mass.gov/portal/index.jsp?pageID=itdterminal&L=3&L0=Home&L1=Policies%2c+Standards+%26+Legal&L2=Drafts+for+Review&sid=Aitd&b=terminalcontent&f=policies_standards_ETRM_v3dot5draft_information&csid=Aitd and referred to in the Globe article, and hope it will be adopted.

I am retired, but am editor of a New York genealogy newsletter, past editor of another New York genealogy newsletter, and proof reader for a Newton organization's newsletter. I also have other occasions to "translate" various other emailed attachments in and out of MS Word and WordPerfect. I run up against "translation" problems a few times a month on the average. It costs me time, effort, and anxiety.

Although MS Word can "open" WordPerfect documents (with or without the .WPD file extension), Word refuses to save or export files to the WPD format, and it makes mistakes in opening WPD files. For instance a title that was centered in WordPerfect is placed in MS Word by using tabs or indent commands, which result in malplacement of the text. Hyphens come through as underscores. Other similar mistakes in "translation" also occur. I then have to spend time adjusting the document in Word to make it right. Additionally, if the document is long, Word and WordPerfect will often take different amounts of space resulting in changes in the number of pages, and that is likely to be unacceptable. Placement of graphics is also often problematic.

I hope that other states will join Massachusetts in giving program vendors such as Corel and Microsoft adequate incentive to improve the compatibility of their programs.

Sincerely,
John D. Leith
162 Islington Rd.
Auburndale MA 0246

From: dpbsmith@verizon.net

Sent: Friday, September 02, 2005 11:16 AM
To: Standards (ITD)
Subject: Support OpenDocument proposal

I applaud your proposal and hope the Commonwealth adopts it. Public information should not be shackled by proprietary formats that are controlled by private interests.

If Microsoft is telling the truth about their intentions for their Word XML format, then, using it as the technology foundation, it should not be burdensome for them to provide seamless bidirectional translation between it and OpenDocument within their Word product.

From: Tin Klanjscek [tin@whoi.edu]
Sent: Friday, September 02, 2005 12:07 PM
To: Standards (ITD)
Subject: Open standard

I applaud the initiative - it is the way to go for productivity, cost and social reasons!

Basing government architecture on proprietary standards is wrong for many reasons, one of them being social bias it introduces. If somebody wants to apply for a job at a government agency that uses proprietary software, they have to buy it to gain experience and increase their chances of obtaining the job. Needless to say, this may be a huge expense for poor people - in many cases much greater than a computer (decent computers can be obtained for free).

I have been using open source Open Office for the past year - and I am much happier than while I was using MS Office. I have had less problems than with MS Word (only one hang-up so far vs. one-a-day with MS software), and - paradoxically - greater compatibility with other versions of MS Word!!! Please note that my computer came with MS Office, and I believe my company has a site licence for it. Therefore, I have free access to MS software and my decision to switch was not guided by costs - I choose to use the open source alternative because it increases my productivity.

Sincerely,

Tin Klanjscek.

From: delphicoder8@yahoo.com

Sent: Friday, September 02, 2005 1:38 PM

To: Standards (ITD)

Subject: c/o Peter Quinn - Fwd: Suggestion to ease migration to an open format

To whom it may concern:

I am forwarding this message in the event that the email address I sent the original email to goes unanswered.

Thank you for your time.

-----Original Message-----

Date: Thu, 1 Sep 2005 11:09:56 -0700 (PDT)

From: <delphicoder8@yahoo.com>

Subject: Suggestion to ease migration to an open format

To: Peter.J.Quinn@massmail.state.ma.us

Good afternoon Mr. Quinn,

I had to research a bit to find your email address, so I hope it's the right one.

Before I begin, I want to make it clear that I am not affiliated with any software company or government entity. Not wanting to risk having this message deleted by attaching a document, I decided to compose it in a simple text format.

I came across an article that commented on your department's plan to migrate to an open source office suite. In that regard, I wanted to offer a suggestion that would help ease migration, while maintaining absolute compatibility with documents, spreadsheets and presentations created with MS Office.

The idea is as follows:

* Install Microsoft Office Viewers (links listed below)

* Install Open Office -- Making sure that you **do not** check the options to associate the suite with MS Office documents.

That's all there is to it.

By following this simple procedure, it will ensure:

* Absolute compatibility with archived MS Office documents. By using the viewers, such documents could be viewed and printed exactly as they were created.

This would also serve to satisfy government requirements of document accessibility for years to come.

* Smoother transition to an open file format

* Less frustration for end users that need to reference archived documents, which goes back to my first point. Ensuring that end users are comfortable with the transition is always a major hurdle. Perhaps you would agree?

I have read through the viewer's EULA and from what I can tell, there is no restriction on it's use by corporate or government entities.

In closing, I believe implementing this simple idea to your migration procedures would help alleviate common transitional issues.

I would greatly appreciate a response from you with regards to the suggestion.

Hope this helps. Have a good day sir.

Regards,

//Rick

Links for MS Office Viewers

Main page:

<http://www.microsoft.com/office/000/viewers.asp>

MS Word 2K3 Viewer

<http://www.microsoft.com/downloads/details.aspx?FamilyId=95E24C87-8732-48D5-8689-AB826E7B8FDF&displaylang=en>

MS Excel 2K3 Viewer

<http://www.microsoft.com/downloads/details.aspx?FamilyId=C8378BF4-996C-4569-B547-75EDBD03AAF0&displaylang=en>

MS PowerPoint 2K3 Viewer

<http://www.microsoft.com/downloads/details.aspx?FamilyId=428D5727-43AB-4F24-90B7-A94784AF71A4&displaylang=en>

Do You Yahoo!?

Tired of spam? Yahoo! Mail has the best spam protection around <http://mail.yahoo.com>

From: Bruce Butterfield [bruce.butterfield@aeroflex.com]

Sent: Friday, September 02, 2005 2:31 PM

To: Standards (ITD)

Subject: Review of Information Domain - Enterprise Technical Reference Model v.3.5

Dear Sirs,

I have been impressed by your work to preserve documents in standard formats, and the fact that you listened to community input. While I know that your choices will be unpopular with some, I believe that the general public will be the benefactors. I hope that my state will soon have the vision that you have. Some of the features of your plan that impress me most are:

- o You are using the work of international standards groups
- o You have chosen well documented file formats
- o You are trying to avoid proprietary document formats
- o You have chosen formats which have been in use for years
- o Software tools exist to support your choice of formats
- o You are allowing a phasing in period to give people time to adjust

Keep up the good work.

Bruce Butterfield

From: Jade Harris [jade.c.h@gmail.com]

Sent: Friday, September 02, 2005 2:37 PM

To: Standards@state.ma.us

Subject: Open Formats Technology, ETRM 3.5

congratulations peter quinn and the IT division of mass gov.

finally people who are on the "inside" of gov, business, and politics (i.e., those who cannot be regarded as "fringe anti-establishment") "get" what technology in a civil society can and should be used for - that is, open collaboration and exchange of information, in order to benefit our community.

i am happy to support the Information Domain - ETRM v.3.5 document, particularly the intention to observe OASIS's e-business data type standards.

best,
-jade.

Jade Harris
Easthampton, MA

From: Sethu Rathinam [sethu@mchsi.com]

Sent: Friday, September 02, 2005 4:45 PM

To: Standards (ITD)

Subject: Comment on: Information Domain - Enterprise Technical Reference Model v.3.5

-----BEGIN PGP SIGNED MESSAGE-----

Hash: SHA1

Dear MASS GOV,

I am an Electrical Engineer working in the Avionics Industry. I wish to provide the following high level comments on the draft Information Domain - Enterprise Technical Reference Model v.3.5.

I strongly support the use of open formats for computer data.

1. Overall, the draft is very good. It is about time someone in authority (like the MA Govt.) took this issue and made it high profile.
2. In history, States (Governments) last very long periods while private companies last much shorter time frames, so an initiative to use open formats is a "no brainer." Such an initiative should occur while things are stable, rather than at the time the company owning the proprietary format (in which a significant amount of public data is saved) is about to go bankrupt or has gone bankrupt. Even in that case, such proprietary formats may have rights of multiple parties that need to be negotiated. So this is a right time for such a proposal to go forward and become a regulation or law.
3. The focus on formats rather than software is an excellent point and is vendor neutral. If some of the big software companies want their products to continue to be used, they MUST be made to accommodate open formats.
4. My concern is that there will be pressure brought to bear on the MA government from certain interests with large resources, whose market is threatened. Those interests will try anything from lobbying to spinning the PR and try to "prove" black is white - they have tried that in the past. I would like to see MA stay its course and not waver or dilute the requirements for open formats.
5. I would like to see, over the longer term, MA should lead the way in moving away from closed software to open software, at least for computer infrastructure (e.g., operating systems) for reasons specified in (2) above.

Thank you for being at the leading edge of common sense, and good luck!

Sethu Rathinam
1515 Greens Way Ct NE
Cedar Rapids, IA 52402.

Tel: 319-294-0007

-----BEGIN PGP SIGNATURE-----

Version: GnuPG v1.2.4 (Darwin)

iD8DBQFDGLnayxPySpu4b20RAm8KAKCmX7Czp6HCaBMrFgLiftbIa3bO2gCg3CCv
djbQBeAmMNwNbO3A0tr57I=
=OZBG

-----END PGP SIGNATURE-----

From: Pace Willisson [pace.willisson@gmail.com]

Sent: Friday, September 02, 2005 4:47 PM

To: Standards (ITD)

Subject: comments on public review draft

I read the public review draft of Enterprise Information Technology Architecture and I think it is a very good plan for the Commonwealth.

I am a member of the Board of Assessors in Medway, but my primary job is in industrial software development. I frequently download data from the state to use in the process of local decision making. For many reasons, I use the GNU/Linux operation system on all my computers, and I frequently run into problems when trying to use data that has been published by the Commonwealth in proprietary formats.

Luckily, with recent releases of Open Office, the problems are usually minor. Once I have the data in a usable form, I'm able to apply a very wide range of tools designed for laboratory use to do analysis and presentations that really help my colleagues in municipal government make better decisions.

I believe that, as the government moves to make data more conveniently available in common and open formats, a wider range of citizens will be allowed to participate, and this will improve the quality of decisions at every level.

I also applaud your goals of identifying the requirements for archival document storage. I think that your strategy of using XML and PDF documents is a good plan.

Finally, I think that the Commonwealth should actively support the creation of open standards for more exotic file formats, such as GIS maps. This support might include monetary contributions to organizations, or perhaps making it part of the job of one or more state employees to make technical contributions to the working groups where the standards are designed.

Pace Willisson
Board of Assessors, Medway, MA
pace@alum.mit.edu
508 533 3203

From: total recycling [hastings37@gis.net]

Sent: Friday, September 02, 2005 8:05 PM

To: Standards (ITD)

Cc: Walsh, Marian (SEN)

Subject: open source data formats

It is wonderful to read that Massachusetts will be insisting on open source formats for all public uses!

-Keith Davison

37 Hastings St. #206-OS

Boston (West Roxbury), MA 02132

From: mmcavoy75@yahoo.com

Sent: Friday, September 02, 2005 11:47 PM

To: Standards (ITD)

Subject: Thank You All (regarding Open Standards)

I just read the good news on groklaw that Massachusetts is as farsighted and independent as reported to be. And I wish to express my admiration and heartfelt thanks to all involved in what could be one of the most momentous IT decisions in the United States to date.

Sincerely,

Monty McAvoy

From: Bruce Raup [braup@nsidc.org]

Sent: Saturday, September 03, 2005 9:16 AM

To: Standards (ITD)

Subject: Hurray! to migration to OpenDocument

Dear Massachusetts standards officials:

Thank you very much for deciding to standardize on the OpenDocument formats. In the past, lock-in to proprietary formats has led not only to interoperability problems, but to vendor lock-in and the balkanization of the computing landscape. Only by insisting on open non-proprietary formats can we fully realize the potential of what computers can do for us. While I don't live in Massachusetts, I hope that your decision will set a precedent that will lead to wide-spread adoption of open formats across the U.S., and indeed the world.

Sincerely,

Bruce Raup

--

Bruce Raup

Phone: 303-492-8814

National Snow and Ice Data Center, U. of Colorado, 449 UCB, Boulder, CO 80309

<http://cires.colorado.edu/~braup/>

From: Fajar Priyanto [fajarpri@arinet.org]
Sent: Saturday, September 03, 2005 5:35 PM
To: Standards (ITD)
Subject: Congratulations!

Dear the state of Massachusetts and ITD, I want to congratulate you on the proposal of using open standards. I am sure that you are going to the right direction and hopefully your lead will also inspire other states and agencies too.

PS:

I am not a US citizen, just an ordinary man from far land who loves openness.

--

Fajar Priyanto | Reg'd Linux User #327841 | <http://linux2.arinet.org> 04:28:30 up 1:25, 2.6.11-1.1369_FC4 GNU/Linux public key: <https://www.arinet.org/fajar-pub.key>

From: spot@draves.org
Sent: Saturday, September 03, 2005 6:53 PM
To: Standards (ITD)
Subject: great stuff

congrats on your decision to use open formats for public business. open office and oasis are great! i fully support your process. we shall overcome!

From: Adrian Wheelock [dev_alac@WPI.EDU]
Sent: Sunday, September 04, 2005 11:10 AM
To: Standards (ITD)
Subject: Open Standards Policy/Enterprise Technical Reference Model

To Whom it may Concern:

I am strongly in favor of the Open Standards Policy as implemented in the Enterprise Technical Reference Model. As a Linux user, the need to use Microsoft products to utilize government webpages and online documents is abhorrent. We should not be forced into one choice in operating system and software when there are other, more secure options available. Consumer choice should not be dictated by the actions of government, nor should it be dictated simply by the government's support of one proprietary format. Every citizen, regardless of their OS, should be able to read and access government documents published online.

Additionally, by enforcing this policy, Massachusetts will enable a multitude of operating systems and will be less vulnerable to viruses and attacks as they will no longer have just one platform to target.

This alone should make Massachusetts a more attractive business location as people will spend fewer resources responding to virus attacks allowing for a more productive workforce.

Thank you,
Adrian Wheelock
32 Lee St #2
Worcester, MA 01602

From: Steven Edwards [steven@codeweavers.com]
Sent: Sunday, September 04, 2005 11:56 AM
To: Standards (ITD)
Subject: OpenDoc XML format

Hello,

The state is doing the correct thing in requiring the OpenDocument format. The ability to access records many years from now outweighs any short term tax savings or any other hypothetical argument for closed proprietary formats. Given the fact that other XML formats are not totally open what would be the situation if the vendor providing the application went out of business? Where would citizens be at in regards to accessing the state data?

Thanks to the people that are fighting for open standards.
Steven

From: Mark Davis [markdavis@cox.net]
Sent: Sunday, September 04, 2005 1:44 PM
To: Standards (ITD)
Subject: Response to Request for Comments

I am not a residence of Massachusetts, but I do hope that Virginia follows your bold lead.

Using open standards for file formats is a superb idea. As a representative of the 150 members of TWUUG, we all applaud your actions and hope that you will "stick to your guns". Microsoft, no doubt, respond harshly. Based on past observations, they will probably:

- 1) Spread FUD (Fear, Uncertainty, and Doubt).
- 2) Attempt to commission bogus studies trying to prove how wrong you are.
- 3) Lobby fiercely in your government legislature.
- 4) Perhaps even resort to bribing officials.

Please know that there are millions of people that support what you are doing, and what you are doing is *right*. It is right for the government of Massachusetts and right for the citizens of Massachusetts.

--

/-----\
| Mark A. Davis Norfolk, VA; EDT (757)-461-5001x431 |
| Director of Information Systems & Commun, www.himss.org |
| Lake Taylor Transitional Care Hospital www.laketaylor.org |
| Adjunct Linux Prof., ITT Technical Institute www.itt-tech.edu |
| Charter Member, TideWater Unix User's Group www.twuug.org |
| Pioneer Member, Electronic Freedom Foundation www.eff.org |
\-----/

From: Patrick Hancock [pat_hancock@hotmail.com]
Sent: Sunday, September 04, 2005 2:44 PM
To: Standards (ITD)
Subject: PDF is a proprietary document format

PDF is a proprietary document format

Don't just search. Find. Check out the new MSN Search!
<http://search.msn.click-url.com/go/onm00200636ave/direct/01/>

From: David L. Cathey [davidc@montagar.com]
Sent: Sunday, September 04, 2005 7:47 PM
To: Standards (ITD)
Subject: Standardizing on OASIS OpenDocument for Text, Spreadsheet & Presentation files

Although not a MA resident, my company provides software/services for Public and Private Transportation systems.

Our company has already standardized on OASIS (via OpenOffice) for all our documentation, etc. We have found that we can easily transport and manipulate documents across Windows, Linux, etc with no compatibility problems. Software to display and print these documents is freely available, and from a variety of software products (and source code is available from many, insuring future portability).

I applaud MA taking having the vision to insure future accessibility and portability for all public documents.

--

David L. Cathey, CIO |Inet: davidc@montagar.com
Montagar Software, Inc. |Fone: (972)-423-5224
P. O. Box 260772, Plano, TX 75026 |<http://www.montagar.com>

From: Efraim Feinstein [feinst@fas.harvard.edu]
Sent: Sunday, September 04, 2005 11:55 PM
To: Standards (ITD)
Subject: Open standards policy

To whom it may concern,

I am writing in response to the request for public comment on the draft "Enterprise Technical Reference Model."

I would like to commend the Commonwealth's Information Technology Division for choosing to standardize all state documents and data in formats that comply with open standards. As a taxpayer, I see the government gaining a number of advantages from this initiative. Firstly, the Commonwealth will be able to take advantage of both competition in the software market and free/open-source software to lower the costs involved in producing data. Secondly, once data formats are standardized between government agencies, there will be fewer obstacles to intergovernmental communication. Thirdly, residents of the Commonwealth like myself will be able to access data provided by the state government without additional software licensing costs to ourselves.

The big software industry should not be allowed to fool the state. Use of formats that are unencumbered by onerous license terms and patents is a necessity for gaining these advantages. Therefore, the choice of OASIS OpenDocument as the preferred format for office documents is well-justified. With this choice, both free/open-source and proprietary software can be leveraged towards the needs of the states' agencies and residents.

That said, there are two relatively minor issues with the policy that I think should be addressed. Firstly, the plain text format is specified as "ASCII text." ASCII is only capable of supporting the latin alphabet. The Unicode UTF-8 standard is backwards-compatible with ASCII, and is capable of supporting most language scripts used in the world. Standardizing on the older ASCII standard will preclude saving plain text documents that use non-latin alphabets. Secondly, there is no provision that there must be software programs available that are capable of using the standardized formats on multiple computing platforms. This is especially a problem for documents and data that will be transferred to state residents. For example, while most platforms are capable of reading PDF format, there are no software programs yet available on some platforms (eg, GNU/Linux) for using its advanced features. These features include document modification and electronically filling in blank spaces in forms.

Thank you for your consideration of these comments.

Sincerely,

--

Efraim Feinstein
18 Ellsworth Ave, Third Floor
Cambridge, MA 02139
Phone: 617-312-0072

Email: feinst@fas.harvard.edu

From: Chad Leigh -- Shire.Net LLC [chad@shire.net]
Sent: Monday, September 05, 2005 4:30 AM
To: Standards (ITD)
Subject: proposed office standards are a good deal

The proposed office SW standards for Massachusetts are a good deal that should save the taxpayer money, and provide for a more open environment. It should also allow other OS platforms to more easily be used. Microsoft Office has shown itself to be a vector for viruses and other malware, as has MS Windows.

Chad

From: Rod Schaffter [rschaffter@comcast.net]
Sent: Monday, September 05, 2005 11:16 AM
To: Standards (ITD)
Subject: Open Document Standards

Dear Sir Or Madam:

I think the Commonwealth's proposed adoption of open document standards is a wise move. This will allow Commonwealth documents to be accessed by future citizens who may not have access to proprietary software, and protect the Commonwealth's investment in IT by reducing the need for forced upgrades to maintain compatibility.

I applaud this proposal.

Sincerely,
Rod Schaffter
108 Legate Hill Road
Leominster, MA 01453

--

"I find, for some odd psychological reason, that I can deal better with a man's exercise of free will if I believe that he has got it."

--G.K. Chesterton

From: Taso Hatzi [taso@soldator.com]
Sent: Tuesday, September 06, 2005 3:27 AM
To: Standards (ITD)
Subject: On publicly owned standards

To All Concerned:

Congratulations on your achievements to date and I wish you all the best in making it all happen in Massachusetts. If only Australian public servants were as motivated to protect the public interest as some of their US counterparts. In the Information Age it is appropriate that we have open publicly owned standards for storing and exchanging information of all types. I sincerely hope you can sell the idea to all of US Government.

--

Taso Hatzi, Soldator P/L, PO Box 88, Ivanhoe VIC 3079, Australia.
TEL: +61 3 9499 2726 / FAX: +61 3 9499 5432 / CELLPHONE: 0419 003 110

From: Jeffrey A. Worth [jworth@stonesav.com]
Sent: Tuesday, September 06, 2005 7:35 AM
To: Standards (ITD)
Subject: Open standards

As a business person, I applaud the efforts of the State to move to open data formats. Proprietary software cannot scale in the manner necessary to satisfy the needs of data sharing. Moreover, security and even legal issues surround Microsoft applications. We should not accept anything less than best of breed purchasing decisions when it comes to data creation, storage, retrieval and re-use.

Thank you for your decision to use open data formats now, and in the future.

Sincerely,

Jeffrey A. Worth

From: Hiris, Jeffrey Richard [Jeffrey_Hiris@brown.edu]
Sent: Tuesday, September 06, 2005 8:24 AM
To: Standards (ITD)
Subject: OpenDocument format for all State documents

Dear Sirs or Madams:

as a resident of Boston and a long-time professional in the data processing field, I would like to express my deep skepticism as to the feasibility of your proposal to require OpenDocument formats for all state data by 2007.

It does not seem to me that there are substantial off-the-shelf products which can manage large and complex documents, spreadsheets, or databases. Microsoft Windows and Microsoft Office are, and likely will continue to be through 2007, the dominant desktop products worldwide. This is in part because of their attention to the needs of large organizations managing large sets of documents over long periods of time. The state does not have the resources to undertake development of competitive desktop applications. Without guarantees of round-trip fidelity between Microsoft products and OpenDocument products, the likely result of the change will be a further divide between residents of the state and its government, since they will not have access to those applications which the

state is using.

This is not to say that requiring XML-based standards for data products developed by the state is unreasonable. Nor is it unreasonable to require that the Microsoft XML formats for Office documents be used for their storage. The explicit inclusion of sensitivity and security information within each document is a good thing. I would hope currency and revision information would be similarly standardized.

However, I would also hope that these are standards applied to interfaces between systems, and archival document stores. It would seem absurd to require the state's operational databases to work at all times using XML representations of data, with all their attendant conversion costs. That is to say, it would be absurd to require e.g. the Registry of Motor Vehicles to store payment information in an XML data store rather than as a set of normalized relational database tables. Likewise it is absurd to require every proposal to the state and every correspondence with the state to be encoded in an XML document conformant to a state-controlled XML schema.

In summary, I deeply fear that any attempt to standardize on the OpenDocument format, statewide, by 2007, will only lead to budget over-runs and a further divide between the average citizen of the Commonwealth and its government.

sincerely

Jeffrey R Hiris
102-12 Tremlett St
Dorchester, MA 02124

From: C.S. Mo [randoma@vui.com]
Sent: Tuesday, September 06, 2005 10:30 AM
To: Standards (ITD)
Subject: Open standards & open source resources

Just wanted to say - I think this is a *wonderful* initiative on the part of the State of Massachusetts! I hope it will effect the town- websites as well, which currently are a hodgepodge of pdf/doc..etc.

Thank you!

--C.S.
(resident of Watertown)

From: Michael ODonnell [michael.odonnell@comcast.net]
Sent: Tuesday, September 06, 2005 1:29 PM
To: ContactANF (ANF)
Cc: Michael ODonnell
Subject: Open standards for document formats

This is just a quick note to express my approval (and even amazement) upon hearing of the announcement that MA will use open document formats. The MA Office of Accounting and Finance is (to some extent) a bureaucracy so I hope you'll forgive me for expecting bureaucratic behavior. It was therefore a pleasant surprise to hear that A&F has not just mindlessly climbed aboard the Microsoft bandwagon, but has instead insisted on using document formats that leave the citizenry (rather than Bill Gates) in control. Nice work - keep it up...!

--Michael O'Donnell (Chelmsford)

From: Collin Park [collin@rc5.us]
Sent: Tuesday, September 06, 2005 4:59 PM
To: Standards (ITD)
Subject: comments on Draft Enterprise Information Technology Architecture - data interoperability, management, formats

Dear Mr. Quinn,

Thank you for the opportunity to comment on the Enterprise IT Architecture. As a taxpayer (though not in your state) and a computer professional, I am gratified to see the emphasis on open standards, the priority that has been placed on long-term accessibility of data, and the vendor-neutral software acquisition (and operational) directives.

It may interest you to know that in the 1970s and 80s, producers and consumers of IT joined forces to end the hegemony of one particular technology behemoth, by formulating open standards for computer communication. This initiative, called Open Systems Interconnect (the OSI of the 1980s), was conducted under the auspices of ISO, the International Organization for Standardisation.

Although the exact communication protocols defined under this initiative do not enjoy the widespread usage which we envisioned for them, the aforementioned hegemony was in fact brought to an end. Thus the OSI initiative was wildly successful in its most important mission, if not in all technical details.

I wish the Commonwealth all success in implementing the new IT architecture and securing the blessings of vendor-neutral long-term access to information for its constituents. And I sincerely hope that this Enterprise IT Architecture will serve as a model for the information technology departments of my own state of California.

Very truly yours

Collin Park

From: karl@tug.org on behalf of Karl Berry [karl@freefriends.org]
Sent: Tuesday, September 06, 2005 5:19 PM

To: Standards (ITD)
Subject: open file formats

To whom it may concern,

Thank you for committing to storing data and conducting government business in open file formats. This is a very positive move, as democratic governments should support freedom and access for all citizens, without requiring proprietary technologies to access government information or perform government work. It also avoids reliance on single vendors and their planned obsolescence strategies of their proprietary formats.

Best regards,
Karl Berry

From: John H Drabik [drabik@us.ibm.com]
Sent: Tuesday, September 06, 2005 5:38 PM
To: Standards (ITD)
Subject: A comment on your open standards position

Simple: "Bravo!"

Open standards and formats are an important part of any system, especially those upon which democracy itself is increasingly dependent. I applaud you for your position, and hope that you will continue to work for open and interoperable systems, with no license, patent, or other restrictions of any kind whatsoever. Freedom demands nothing less.

Over the centuries, Massachusetts has been birthplace of many documents that are of critical importance to all citizens. Your state has also been a leading force in education, to support and extend the concepts of freedom to all. Congratulations on being the first state to take an important position on behalf of your citizens in the area of technological document availability, control, management -- and unfettered access.

As a former resident of Massachusetts myself, your lead is one I hope all the other states will follow.

John Drabik

From: Jerry Berrier [jerry.berrier@townisp.com]
Sent: Tuesday, September 06, 2005 6:42 PM
To: Standards@state.ma.us.
Subject: I Oppose Open Source Programming
Dear Peter Quinn,

I am deeply concerned at the potential effect open source programming would have on the ability of people who are blind to access and use state systems and documents.

It is imperative that the effect on people with disabilities be considered before such a change is made.

I am blind, and I rely heavily on a screen reader called JAWS and on Microsoft applications such as Word and Excel. As a blind person, I do not have the luxury of switching to other applications. These work well with JAWS only because scripts have been meticulously written to make them work. In addition, I and others have had extensive training to enable us to use JAWS with popular Microsoft applications.

Thank you for your serious consideration of this matter.

Sincerely,

Jerry Berrier
President, Bay State Council of the Blind

From: Sharon Strzalkowski [strzal@charter.net]
Sent: Tuesday, September 06, 2005 9:04 PM
To: Standards (ITD)
Subject: please do not go to Open Source

Hello. I am writing as a blind state employee in opposition to Open Source, which is totally inaccessible to blind and visually impaired people. We have worked long and hard to get the computer access we now enjoy, and it would cause much harm to go to this new and inaccessible system. Thank you for reconsidering this plan.

Sharon Strzalkowski
strzal@charter.net

From: Gerard Boucher [grboucher@mva.net]
Sent: Wednesday, September 07, 2005 12:50 AM
To: Standards (ITD)
Subject: Urgent!

Mr. Peter Quinn, I/We oppose a change to open source programming because of the potentially negative impact it will have on employees and consumers with disabilities, particularly those who are blind

and use screen readers. We believe the proposed change would fly in the face of the Americans with Disabilities Act, possibly leading to a loss of employment for some state employees who are blind!

Gerard Boucher Blinded Combat Veteran!

65 Hilldale Ave.

Haverhill, MA 01832

978-521-3982

Ps. Delegate, Liaison, for BVA, Braille and Talking Books, DAV, ABC, NFB, etc.

From: Maciek Sakrejda [mgsakrejda@berkeley.edu]

Sent: Wednesday, September 07, 2005 2:41 AM
To: Standards (ITD)
Subject: Open standards

Hi,

I applaud your support of open standards, but I find this:

http://validator.w3.org/check?uri=http%3A%2F%2Fwww.mass.gov%2Fportal%2Findex.jsp%3FpageID%3Ditdterminal%26L%3D3%26L0%3DHome%26L1%3DPolicies%252c%2BStandards%2B%2526%2BLegal%26L2%3DOpen%2BStandards%26sid%3DAitd%26b%3Dterminalcontent%26f%3D_policies_standards_open_standards_policy%26csid%3DAitd

amusing.

Sincerely,
Maciej Sakrejda

From: Thomas Anderson [andersonthomas@gmail.com]
Sent: Wednesday, September 07, 2005 4:37 AM
To: Standards (ITD)
Cc: campaigns@fsf.org
Subject: Your decision regarding open standards.

I'd like to compliment you for your wise decision regarding using open standards for file formats. I'm a citizen of Sweden but since we live in such an interconnected world, your (USA with its states) decisions affect us very much. I can only hope my government has the same insights you obviously have. You are a good example! Keep it up!

--

Regards,

Thomas Anderson
"Quidquid latine dictum sit, altum sonatur"

From: Gilberto Gaudêncio [ggaudencio@citeve.pt]
Sent: Wednesday, September 07, 2005 7:17 AM
To: Standards (ITD)
Subject: OpenDocument format

Dear sirs,

Embracing the OpenDocument format is the wisest choice you can make. In 50 years you will still be able to read documents in OpenDocument format. If you choose Microsoft proprietary format, you will not have such guarantee. MS can cease to exist, or release incompatible versions of the Office suite,

leaving you with no choice but to convert all the old documents to another format.

It's a smart choice to avoid the conversion cost altogether by going with the OpenDocument format right away.

Thank you.

--

Gilberto Gaudêncio

CITEVE
Centro Tecnológico das Indústrias
Têxtil e de Vestuário de Portugal

From: Chris Samuel [chris@csamuel.org]
Sent: Wednesday, September 07, 2005 9:32 AM
To: Standards (ITD)
Subject: Comment on MA's courageous choice of open standards

Greetings from Australia!

I know that it's probably not my place to comment that I'm not even in your country, let alone your country, but I'd just like to offer some feedback from a different viewpoint about the importance of open standards.

As well as having been working with UNIX systems since the late 80's I've had a keen interest in history and archaeology since I was a child, and I've come to learn that the real treasure of those fields is not in the gold objects or the jewels, but in the documents that have managed to survive to the present day. There are wonderful finds such as huge numbers of Roman letters preserved at Vindolanda on Hadrians Wall in Scotland, the bark letters that survived from medieval Novogorod in Russia and Bactrian documents from Afghanistan.

There is also the famous Domesday Book from the UK, created in 1086 and still used as a source as how the country was structured at that time and before the Norman Conquest.

In 1986 the UK's state broadcaster, the BBC, decided that a great way to celebrate its 900th anniversary would be to create a new interactive Domesday Book using computers, so they hired a company to create the system and sold them to schools.

Less than 15 years later a project had to be formed to try and figure out a way of recovering all the information from the disks as technology had marched on and the information was effectively unreadable. It took them three years to recover the data, and that was **with** enlisting people from the original team who created it!

I feel that locking government documents away in proprietary formats is equivalent to putting a timed self-destruct mechanism on them, it is highly unlikely that within a decade you would still be able to

open them in the software of that time.

With open standards for documents then anyone with sufficient ability can implement a reader or converter to a different format, all the information that they require should be available to them without fear of legal action being taken against them.

We owe it to our descendants to leave them the documents that give them an insight into our times comparable to those we enjoy of previous ages. But if we don't take those steps now to ensure that they at least can read our "handwriting" (if you will) then they will have a task similar to ours in deciphering the Inca's khipu knots that we still cannot read.

Chris

--

Chris Samuel : <http://www.csamuel.org/> : Melbourne, VIC

This email may bear a PGP signature as an attachment. Do not panic.
For more info see: <http://en.wikipedia.org/wiki/OpenPGP>

From: Robert S Sutor [sutor@us.ibm.com]
Sent: Wednesday, September 07, 2005 9:59 AM
To: Standards (ITD)
Cc: Quinn, Peter J. (ITD); McLellan, Christine (ITD); Tim Sheehy; Roslyn Docktor; Douglas Heintzman
Subject: IBM feedback on the Enterprise Technical Reference Model v.3.5
- Public Review Draft

Dear Mr. Quinn and Ms. McLellan:

On behalf of IBM, I am writing in response to your request for feedback on the Enterprise Technical Reference Model v.3.5 - Public Review Draft, which identifies the newly ratified OASIS Open Document Format for office applications to be the standard for all official records the Commonwealth creates and saves.

IBM appreciates the leadership of the Commonwealth of Massachusetts in this area. The exhaustive process you have taken to arrive at this document, engaging all stakeholders and sharing these technical references for comments, can be a model to guide other states and governments in their migrations. IBM was pleased to participate in these discussions and looks forward to continuing to support the Commonwealth in its efforts.

We support the recommended guidelines, especially the technology specifications for the OASIS Open Document Format. We think your target date for implementation, 2007, is aggressive but understand the need to set a stake in the ground to begin this important migration to open standards for the documents that you create and maintain. These are your documents and the technical specifications that you have articulated will help ensure that you maintain control and future use over them, something which will be very important to the citizens of Massachusetts.

Thank you for the opportunity to provide our comments. Please do not hesitate to call on any of us at IBM to respond to any additional concerns.

Sincerely yours,

Bob

Dr. Robert S. Sutor

VP, Standards and Open Source, IBM Corporation Office 585-243-2445 / Mobile 585-202-0900

Assistant: Veronica DiNucci - 914-765-4620 / dinucci@us.ibm.com

Internal blog:

<http://blogs.webahead.ibm.com/pilot/weblogs/page/sutor@us.ibm.com>

External blog:

http://www-106.ibm.com/developerworks/blogs/dw_blog.jspa?blog=384

From: Art [buzzbell@mac.com]

Sent: Wednesday, September 07, 2005 10:25 AM

To: ContactANF (ANF)

Cc: dmarkowitz@sec.state.vt.us

Subject: Thank you Massachusetts- Open Document Standard

For supporting the Open Document Standard. Please convince all the states to support this great work.

This will save you, millions and create easier to use, MUCH less expensive tools for everyone.

Starting in schools, if students come to understand there can be choices in the digital tools they use, they will grow up seeking out the best tools for the job, over the currently mandated ones.

Thanks again.

Art Bell

Burlington, VT

From: Thomas Vaughan [tevaughan@gmail.com]

Sent: Wednesday, September 07, 2005 11:42 AM

To: Standards (ITD)

Cc: campaigns@fsf.org

Subject: OpenDocument Format

The Commonwealth of Massachusetts, in adopting an open standard for its official documents, provides hope that the public good will be served by the state. Changing the rules so that the state is no longer bound by necessity to purchase goods from a monopoly is a service to the taxpayers. Moreover, by enabling the public's use of free software, which may be used to read the state's official documents, the state protects the individual citizen's natural freedom to exchange information with others.

May the example of Massachusetts, in setting open standards, be followed by every state in the union.

--

Thomas E. Vaughan
Aurora, CO

From: Arthur Cannon [ACannon@EASTERSEALSMA.org]
Sent: Wednesday, September 07, 2005 1:38 PM
To: Standards (ITD)
Subject: Change over to Open Source Linux

Dear Mr. Quinn:

There are many people with disabilities who would not be able to function in their jobs if a change was made to Linux without laying out a plan for this population. Serious and important issues such as guaranteeing this population that the software they need to function in their jobs are in place and functioning before such a move.

I would strongly suggest your office employ a technically orientated liaison person to work out any and all issues before such a move is undertaken. There are strong legal issues here which could result in a lawsuit against the state of Massachusetts by a disenfranchised and unemployed disabled members of the state. Such a crisis can be avoided by proceeding with caution and considering all aspects of the issue.

Thank you,

Arthur F. Cannon Sr.

From: LILLIAN JOHNSON [lillian612@verizon.net]
Sent: Wednesday, September 07, 2005 2:31 PM
To: Standards (ITD)
Subject: oppose a change

I oppose a change to open source programming because of the potentially negative impact it will have on employees and consumers with disabilities, particularly those who are blind and use screen readers. We believe the proposed change would fly in the face of the Americans with Disabilities Act, possibly leading to a loss of employment for some state employees who are blind.

Lillian Johnson and Karen Bellantoni

From: Mahalingam Ramkumar [ramkumar@cse.msstate.edu]
Sent: Wednesday, September 07, 2005 2:03 PM
To: Standards (ITD)
Subject: OASIS OpenDoc XML

I sincerely applaud the intention of MA to adopt true open standards -

1. vendor neutral, and
2. more importantly a "standard" that is not hampered by small legal "gotchas" for office documents.

Apart from the fact that a wide variety of office suites supporting such formats are already offer advanced levels of functionality, adoption of such standards will also open up new avenues for software development and job oppurtunities for developers in the US, for creating efficient and useful solutions for the complex problem of automating assimilation of information from documents.

Furthermore it would also spur new levels of usability and performance of existing office software and those that will be developed in the future due to the level playing ground for Office applications.

Every delayed day in adopting the new format implies increased expense of migration. I wish your state would set an example for all other states and the federal government to follow suit.

From: Adam Klempner [adamk@WPI.EDU]
Sent: Wednesday, September 07, 2005 3:10 PM
To: Standards (ITD)
Subject: Support for the open document format.

I would just like to take the time to express my strong support for the open document format that is being considered for the Commonwealth of MA. I have lived in this state all of my life and think this is one of the smartest things the state could do for a long term document plan. I imagine there will be considerable resistance in the short term, but the benefits of the open document format will be realized in the long term.

I applaud the forward thinking that is being put forth by the state, and I hope that other states and the federal government will follow.

I am a user of both MS Office and OpenOffice, and I can attest to the fact that people will be hesitant to make the switch of OpenOffice (if MS doesn't make a compatible suite), but in the long run the transition isn't that difficult and could potentially save the state a lot of money in software licensing. But best of all, an open standard means that we, as a state, and as citizens, will NOT be locked into a proprietary format that is controlled by a single company. I appreciate this freedom.

Good job with the Enterprise Technical Reference Model v.3.5, I hope that it is accepted.

Sincerely,
Adam Klempner
11 Williams Rd.

Concord, MA 01742

The Information Technology Division
The Executive Office for Administration and Finance
The Commonwealth of Massachusetts
By Email: Standards@state.ma.us

Cc: Secretary Eric Kriss
Cc: Peter Quinn, Chief Information Officer

Re: Information Domain -- Enterprise Technical Reference Model v.3.5

To the Information Technology Division:

On behalf of the Association for Competitive Technology's (ACT) more than 3000 developers and small business technology companies, I write to express my serious reservations about the recent Commonwealth proposal to make the OASIS Open Document Format the standard for use by all state agencies as of January 1, 2007. While permanent access to government data is extremely important, this particular proposal fails to advance the state of the art, is limiting to citizens, and would prevent many small businesses from competing for government contracts. Finally, the proposal is inconsistent by supporting the openly available but patented, proprietary pdf format, but rejecting the equally open Microsoft XML schema.

Adopting a standard that is neither technologically advanced nor widely used in the marketplace is of serious concern for small technology companies trying to do business with the state. For small businesses that are focused on innovating in the document format space, this 'vendor lock-in' prevents them from selling to one of the largest available markets.

While some suggest innovation in formats is not important, the evidence clearly refutes their claims. Currently, users are able to embed pictures, add hyperlinks and even put sound files into a document. Yet, had the Commonwealth standardized on the original WordPerfect 5.1 format in the early 90's, these capabilities would be unavailable today.

Furthermore, the Commonwealth will require new document functionality as it continues to evolve its e-government offerings. For example, protecting document privacy will be essential as the state moves forward to share data between departments. The OASIS standard does not have the same security capabilities as those developed by companies like GigaTrust and Visual Rights, and never will. Instead, these innovative companies will be forced to develop products that may lack full functionality in order to compete for contracts in Massachusetts.

Most troubling, however, is that the Commonwealth's desire for 'openness' may actually result in the adoption of a format that is completely inaccessible for most average citizens. Citizens of the Commonwealth would be required to acquire and install software just to access government information. For dial-up users, the Open Office download alone will consume several hours. Moreover, there is no native Open Office for Macintosh users. While this may be a net gain for ACT's members who provide support to government agencies and private industry, the cost to citizens will be extraordinary.

The need to have permanent access to the data moving forward is laudable, but can be achieved through agreements with vendors rather than locking the state into a quickly outdated format. By implementing any of the available XML schemas, the data itself will always be available, and third party companies will be able to write software tools to move the data forward from one generation to the next. By locking the Commonwealth into just one XML schema, you lose the advantage of innovation, with no real gain in data access.

The most confusing aspect of this proposal is its incredible inconsistency. Adobe Acrobat's highly functional pdf format is recommended, but yet in a recent interview, Secretary Kriss is quoted as saying, "What we've backed away from at this point is the use of a proprietary standard and we want standards that are published and free of legal encumbrances, and we don't want two standards." Clearly, the patented and trademarked pdf format is "encumbered" even if Adobe makes it available for independent use and development. And the pdf format is a document format in its own right, one that allows editing, metadata, embedding and many of the other features that users need. So is the issue "not having two formats", or not being "encumbered?"

Ultimately, this proposal hinders the Commonwealth's ability to adopt new technologies, limits access to data by everyday citizens, and keeps small business from competing in one of the fastest growing markets – data management. We urge you to reconsider this policy, and instead adopt one that maintains access to data without restricting innovation and market access for small firms.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Zuck". The signature is written in a cursive, slightly slanted style.

Jonathan Zuck
President
The Association for Competitive Technology

From: David Olsson [davidolsson@yahoo.com]
Sent: Wednesday, September 07, 2005 5:50 PM
To: Standards (ITD)
Subject: Information Domain of the Enterprise Technical Reference Model
v.3.5

As a software developer sometimes involved in XML document management, I applaud your adoption of XML in general and specifically encourage you to hold firm in specifying OASIS Open Document Format for Office Applications (OpenDocument) for office applications.

There is no strong reason for Microsoft not to support this public standard, other than of course their desire to maintain proprietary control over office documents. Besides the competent products that already support OpenDocument, I suggest that filters allowing Microsoft Office products to open and save to OpenDocument files will be forthcoming. If in fact some do not already exist.

David Olsson
116 Pleasant St., Apt. #1
Easthampton, MA 01027
(413) 530-6689

From: Gavin Baker [grbaker@ufl.edu]
Sent: Thursday, September 08, 2005 2:51 AM
To: Standards (ITD)
Subject: I support open standards

To whom it may concern:

I applaud your moves toward the use of open file formats on Massachusetts computers. This is a wise move for the Commonwealth: it means you won't be locked in to any company's proprietary format, tied to their software, exposed to the possibility of massive costs and problems when the time comes to migrate to other software.

Open file formats also enhance accesibility to users of different equipment: files are accessible regardless of operating system, regardless of computing environment.

Additionally, the use of open formats supports the free/open source software community, a wise investment in the Commonwealth's economic development.

Open file formats mean the user can't be held hostage. Their use is a step forward for Massachusetts -- and sets a welcome standard for other states.

Cordially,
Gavin Baker
President, Florida Free Culture
< <http://uf.freeculture.org/> >

From: Mike Gorse [mgorse@alum.wpi.edu]
Sent: Thursday, September 08, 2005 10:31 AM
To: Standards (ITD)
Subject: standards for the procurement of software

I am writing in regard to the proposed change to the standards for the procurement of software that would require state documents to be either PDF files or XML documents in the OpenDocument format. As a person who is blind, I am concerned that any change in the software being used could potentially have adverse effects on those of us who use screen readers, both for people who need to read documents and for blind employees of the state, if proper consideration is not given to accessibility. Sufficient time should be provided to evaluate the accessibility of new products being selected for use so that problems can be resolved if they arise.

Also, for forms that can be filled out electronically, it is important that we not lose this ability, as printing out a form and filling it out on paper is impossible for a person who is blind. If such documents are ultimately converted into PDFs, then they should be required to be accessible forms. Adobe has instructions for creating such forms at http://www.adobe.com/products/acrobat/access_book8.html

I understand that officers of the Bay State Council of the Blind and the Disability Policy Consortium have requested a meeting, so I urge you to meet with them to help ensure that any changes that are made go smoothly for people with disabilities.

Thanks,

-Michael P. Gorse
386 River ST
Waltham, MA 02453
(781)209-2630

From: Fred . [eldmannen@gmail.com]
Sent: Thursday, September 08, 2005 11:01 AM
To: Standards (ITD)
Cc: campaigns@fsf.org
Subject: OpenDocument Format

I think that it is very good that you have decided to go for OpenDocument formats and free software.

Don't bow down to big software corporations wishing to milk money.

From: dpc ma [dpc_ma@yahoo.com]
Sent: Thursday, September 08, 2005 11:10 AM
To: Standards (ITD)
Cc: Quinn, Peter (POL); rhachey@mabcommunity.org; Jerry Berrier; Myra Berloff; patty.correa@ago.state.ma.us
Subject: Open Source Standards

Mr. Peter Quinn:

The Disability Policy Consortium is hereby requesting that the Information Technology Division put all plans to convert to an open source information trechnology platform on HOLD until the DPC, representatives of the blind and visually impaired communities, and The Massachusetts Office on Disability are assured that the technology will not further impair people with disabilities who work for the Commonwealth or need to communicate with the Commonwealth in a mryiad of ways.

We are disappointed that you did not seriously consider our request to meet with you and consider this another example of people with disabilites being ignored as has been amply demonstrated in events unfolding daily from Lousianna.

Yours truly,

William F. Allan
Executive Director
617 359-2599

Disability Policy Consortium
Box 77
Boston MA 02133
617 499-6957

From: Brendan O'Donoghue [brendan.odonoghue@precisionsoftware.com]
Sent: Thursday, September 08, 2005 11:51 AM
To: Standards (ITD)
Cc: mwendy@comptia.org
Subject: Massachusetts Open Document Format Is Bad for the State, Taxpayers, IT Industry
Dear Mr. Quinn,

Your recent proposal to mandate an open-source-only data format (e.g., Open Document) for the Commonwealth's needs is unnecessary, wasteful, costly, taxpayer unfriendly, and harmful to the IT industry.

We respectfully urge that you reject this proposal outright.

Thanks for your attention to this important matter.

Yours sincerely,

Brendan O'Donoghue

Executive Chairman

Castlewood House, Castlewood Avenue, Rathmines, Dublin 6, Ireland

651 W Washington Blvd, Suite 303, Chicago, IL 60661, USA

From: Viganò Corrado [corrado.vigano@ekip.it]

Sent: Thursday, September 08, 2005 11:53 AM

To: Standards (ITD)

Cc: mwendy@comptia.org

Subject: Massachusetts Open Document Format Is Bad for the State, Taxpayers, IT Industry

Dear Mr. Quinn,

Your recent proposal to mandate an open-source-only data format (e.g., Open Document) for the Commonwealth's needs is unnecessary, wasteful, costly, taxpayer unfriendly, and harmful to the IT industry.

We respectfully urge that you reject this proposal outright.

Thanks for your attention to this important matter.

Corrado

From: swhiser [shiser@cloud9.net]

Sent: Thursday, September 08, 2005 1:01 PM

To: Standards (ITD); McLellan, Christine (ITD)

Cc: Leon Shiman; Boldman, Claudia (ITD); Nardone, Stephen (ITD); Kriss,

Eric (ANF); Vaverchak, Timothy (ITD); Phillips, Victoria (ITD); Hamel,

Linda (ITD); Cote, Alan (SEC); Quinn, Peter (POL)

Subject: Sam Hiser's comment on the ETRM draft document v 3.5

Christine-

As you may be aware, this letter of comment was published earlier this week, here:

<http://laxer.com/module/newswire/view/42705/index.html>

September 6, 2005

Peter J. Quinn

Chief Information Officer

The Commonwealth of Massachusetts

Information Technology Division

1 Ashburton Place,

Room 1601

Boston, MA 02108

TO: standards@state.ma.us

Dear Mr Quinn:

The ETRM draft document v3.5

<http://www.mass.gov/portal/index.jsp?pageID=itdterminal&L=3&L0=Home&L1=Policies%2c+Standards+%26+Legal&L2=Drafts+for+Review&sid=Aitd&b=terminalcontent&f=policies_standards_ETRM_v3dot5draft_information&csid=Aitd>

represents a giant leap in the right direction for Massachusetts (and other organizations) toward realizing the potential of open software standards. If Massachusetts' declaration in this document is fully comprehended in its substance and style, it will influence government, business and educational organizations around the world, but particularly in North America, to make like commitments at the soonest possible time to IT architecture plans around next-generation information standards.

The document as a whole reflects an intelligent and disciplined description of the Commonwealth's vision for the information and data standards that it will deploy in specific contexts of its business. Itself, a 20-page outline for a new conception of a State-wide information architecture, the document communicates in only a few words a volume of underlying knowledge and careful thought about XML standards and their practical relevance to the business of the State enterprise and to the State's requirements for creating and handling data. The document is a coherent and unique expression of confidence -- the first from either the public or private sector -- in the potential benefits of data re-use, interoperability and manageability around existing markup standards. Doing all this, it sponsors our humble applause for the impact it will have in improving efficiency of services across government and in the home-land security of Massachusetts and beyond.

Regarding the part of the document on document formats -- the only section upon which I am either qualified or invited to comment -- I find no flaws. However, there is a 'y' missing from the Migration paragraph, 3rd sentence, on page 18: "...agencies may continue to use the office applications the[y] have currently licensed." No other changes to the text or the approach of the document are recommended.

The choice of OpenDocument as the Commonwealth's open XML standard for office documents reflects an appropriate respect for the correct criteria of openness in a file format specification. Such criteria include:

- collaborative, open and public development by consensus and due process;
- public access to specification meetings;
- absence of patent or practical encumbrances;
- stewardship by an agreed technology standards organization;
- large adoption & popular acceptance;
- compatibility with other software under numerous licenses;

-among other criteria articulated by Ken Krechmer, below;

Your office also appears to have been influenced by other sound views on openness criteria, including those of Ken Krechmer, Fellow at the International Center for Standards Research, University of Colorado. Specifically, Mr. Krechmer has noted that the criteria for openness of a software standard may be different from the point of view of different standards stake-holders: Creators, Implementers and Users. He holds that

-the creation of the standard follows the tenets of open meeting, consensus and due process;

-implementers of an existing standard would call a standard open when it serves the markets they wish, it is without cost to them, does not preclude further innovation (by them), does not obsolete their prior implementations, and does not favor a competitor;

-and users of an implementation of the standard would call a standard open when multiple implementations of the standard from different sources are available, when the implementation functions in all locations needed, when the implementation is supported over the user's expected service life and when new implementations desired by the user are backward compatible to previously purchased implementations.

(See notes

<http://www.mass.gov/portal/index.jsp?pageID=itdterminal&L=3&L0=Home&L1=Policies%2c+Standards+%26+Legal&L2=Open+Standards&sid=Aitd&b=terminalcontent&f=_policies_standards_open_formats_summit_notes060925&csid=Aitd>
from the Open Formats Summit held in June 2005.)

While the ETRM draft document's weaknesses are imperceptible, its strengths are myriad and function on different levels. Rather than a rejection of any specific implementation of software, it is a positive and unconfused declaration for certain XML and related markup standards to which the Commonwealth will adhere in certain general types of information and system management contexts including Data Interoperability, Data Management, Data Formats and Records Management (TBD later). The ETRM draft document excludes no single product or company willing to deploy the noted standards in a respective area.

In keeping the focus on document format STANDARDS, the Commonwealth achieves something extraordinary. It brings the discussion, where it belongs, down to the fundamental level, the finest level of granularity in an IT context, of data. The document skillfully leaves the question of implementation (that is, the questions of APPLICATION and VENDOR) aside. This makes it an ideal approach to a grand and far-reaching technology specification, opening the door for the State to build a new technology architecture that may function cost-effectively and flexibly to meet the dynamic business needs of the State in its day-to-day

processing, collection, storage and creation of data while multiplying its vendor options. The office document file format issue is only a small -- but still important -- part of this broader, superior context. (To have directed the conversation up the software stack -- away from the fundamental standards, themselves -- would have reduced the chances for successful implementations in each case.)

The ETRM document is a model worth copying. If the Commonwealth of Massachusetts had set out with this document to provide a textual and strategic template that is easily implementable for the 50 other States in their own information technology policies, Massachusetts would have accomplished their objective. Only the task of doing a Find->Replace for the text string, 'Commonwealth of Massachusetts,' would remain for each of the other United States of America if they would wish to express for themselves an articulate and coherent vision for the future configuration of all their IT systems around available XML standards. The broad scope of this document gives it an inordinate chance of success, providing an auspicious start to the IT revolution based upon open software standards.

Sam Hiser
Managing Director

Hiser + Adelstein
New York, New York

cc:

Eric Kriss (CoMA, ANF), Mary McRae (OASIS), Leon Shiman (CoMA, ITD), Doug Johnson (Sun), Jim Saliba (CA), Scott Peterson (HP), Tim Vaverchak (CoMA, ITD), Patrick Gannon (OASIS), Victoria Phillips (CoMA, ITD), Steve Nardone (CoMA, ITD), Claudia Boldman (CoMA, ITD), Kirk Massen (Novell), Roslyn Docktor (IBM), John Macri (IBM), Bob Sutor (IBM), Brian Burke (Microsoft), Stuart McKee (Microsoft), Leslie Tan (Microsoft), Ira Heffan (Goodwin Procter), Alan Cote (CoMA, SEC), Douglas Heintzman (IBM), Linda Hamel (CoMA, ITD).



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ITS07 Certified
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The Information Technology Division
The Executive Office for Administration and Finance
The Commonwealth of Massachusetts
Via E-mail: Standards@state.ma.us

To the Information Technology Division:

I am writing to express my alarm regarding your proposed policy, which mandates an Open Document Format for all of the Commonwealth's agencies' IT projects and needs. In short, this is a solution in search of a problem, a problem which the Commonwealth does not have. Consequently, I urge that you hastily reject the proposal, seeing it for what it truly represents – a move that will increase the state's IT costs by limiting competition; cause the removal of fully functional software at great taxpayer expense; and shift additional costs onto the private sector and residents as they seek to communicate with government officials through the Commonwealth's newly preferred means.

My business – Hub Technical Services, LLC – is a Value Added Reseller (VAR) of IT products and services based in South Easton, Massachusetts. For 15 years, Hub Technical Services has served the greater-Boston area with essential IT products and service offerings, focusing in particular on the K-12, Higher Ed, Healthcare, State/Local, SMB and enterprise markets. Hub Technical employs 32 individuals in the Commonwealth.

All of what the Commonwealth needs, in terms of data interoperability and archival purposes can now be accomplished among the various applications and suites presently used by the state. Importantly, this infrastructure – which exists at the agency, private business and citizen level – is well established, well understood, and well supported. Pushed by the competitive market, document and data interoperability continually expands, reaching both retroactively into past offerings, and prospectively into new products and services. In short, the tools the state needs to keep citizen information accessible now and into future already exist without market distorting, government mandate.

However, with the proposed mandate, a needlessly disruptive, cascading effect will be triggered.

- The proposal would force the removal of infrastructure that already meets the needs of taxpayers and administrators. With no clear benefit, technical advantages or costs savings, the proposal causes the taxpayer to finance twice what already is being accomplished through the advance of market-based, technological innovation, as best seen in the present infrastructure.
- Almost over night you will have reduced competition, largely negating the overwhelming benefits of the present infrastructure. Many of those that now can offer competitive solutions to the Commonwealth – in-state and out-of-state providers – will not be able to do so because their businesses are not geared to this new “extra-structure.” This will significantly lift costs to the taxpayer due to the fact that you will be looking for services from a substantially smaller subset of VARs.

The logo for Compaq, featuring the word "COMPAQ" in a bold, red, sans-serif font.



The logo for Lexmark, featuring the word "LEXMARK" in a bold, black, sans-serif font with a red diamond shape below the "A".



The logo for Symbol, featuring the word "symbol" in a bold, black, sans-serif font with a red horizontal line through the middle of the letters.





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- OpenOffice is currently in Beta version 2.0 – it is probably the frontrunner for any Open Document-compliant switchover. That said, it's "not ready for prime time". I'm not sure why any organization – let alone the Commonwealth – would work to deploy a business tool that is still essentially in the testing phase. This becomes ever-more disconcerting when one goes onto the OpenOffice website to download the 2.0 Beta version, or the "stable" version 1.1.4 (the two available offerings). To be frank, I don't have much faith in OpenOffice when the Beta is still being tested, and the flagship version is, well, just "stable". Mandating such an untested and unsupported format to replace a widely-used, successful one is not a wise move, especially for the Commonwealth.
- Agency administration will not be able to deal with such a "flash-cut" in suite protocols and applications offerings. Simply put, they lack the needed labor support to effectively migrate to this new system. Seeking to meet demand, agencies will be competing in a limited talent pool for outsourced labor in order to make their systems Open Document compliant. Even though this may save some costs (because most of this work will be performed by non-union personnel), these savings will be far outweighed by consulting fees and expansive service contracts to deal with the plethora of "hydra-like" migration and archival issues intrinsic in the switch.
- Agencies serve constituents. They do so largely by communicating with them. Much of this communication occurs over IT-enabled services and applications. Thus, the logical extension of this policy would be to impose *de facto* compatibility requirements on businesses and citizens. Such requirements, however, will shift additional and needless costs back on to taxpayers. If constituents want to efficiently communicate with their government, they will likely have to purchase compatible application suites or services to do so. They may even have to acquire redundant hardware to accomplish this goal due to incompatibilities in their present systems. Moreover, the regular update and ongoing support, from a non-professionally oriented, end-user standpoint (i.e., your basic constituent) still leaves much to be desired, potentially further frustrating citizen-centric, state-provided IT services.

Though the goal of the Administration is admirable, it presents a flawed choice. Right now and into the future, the Commonwealth can more than adequately exchange and save data in a citizen-friendly manner. "Gold plating" the system, while at the same time limiting competition, locking-in technological solutions, lifting taxpayer costs, and imposing new burdens on taxpayers cannot be justified. As such, I respectfully urge that you reject your Open Document Format proposal – it seeks a supposed "perfect" that can only be the enemy of the good.

Sincerely,

Robert Germain

The logo for Compaq, featuring the word "COMPAQ" in a bold, red, sans-serif font.



The logo for Lexmark, featuring the word "LEXMARK" in a bold, black, sans-serif font with a red diamond shape below the "A".



The logo for Symbol, featuring the word "symbol" in a bold, black, sans-serif font with a red horizontal line through the middle of the letters.



From: Mary DuBois [marydubois@comcast.net]
Sent: Thursday, September 08, 2005 2:29 PM
To: Standards (ITD)
Subject: Open Source Programming
Dear Mr. Quinn,

I want you to know that I oppose a change to open source programming because of the potentially negative impact it will have on employees and consumers with disabilities, particularly those who are blind and use screen readers. The proposed change could possibly lead to a loss of employment for some state employees who are blind.

I have a friend who is blind, who performs an invaluable service working for the Massachusetts Commission for the Blind. Not only does he deal with housing issues for people who are visually impaired, but he also visits schools, camp programs, etc. educating people about blindness. Do you know how many people DO NOT know how a person who is blind gets through everyday life???

Please take this into consideration.

Sincerely,

Mary DuBois

From: David de Bhál [david.debhal@v-practice.com]
Sent: Thursday, September 08, 2005 2:32 PM
To: Standards (ITD)
Subject: Massachusetts Open Document Format Is Bad for the State, Taxpayers, IT Industry
Dear Mr. Quinn,

Your recent proposal to mandate an open-source-only data format (e.g., Open Document) for the Commonwealth's needs is unnecessary, wasteful, costly, taxpayer unfriendly, and harmful to the IT industry.

We respectfully urge that you reject this proposal outright.

Thanks for your attention to this important matter.

David de Bhál

www.v-practice.com

From: Mike Wendy [mwendy@comptia.org]
Sent: Thursday, September 08, 2005 3:33 PM
To: Peter Quinn
Subject: The State of Massachusetts Open Document Mandate

Dear Mr. Peter Quinn:

Your recent proposal to mandate an open-source-only data format (e.g., Open Document) for the Commonwealths needs is unnecessary, wasteful, costly, taxpayer unfriendly, and harmful to the IT industry.

We respectfully urge that you reject this proposal outright.

Thanks for your attention to this important matter.

Sincerely,

Mike Wendy
4350 N. Fairfax Dr
Suite 440
Arlington, VA 22203-1624

From: DC Parris [dcparris@matheteuo.org]
Sent: Thursday, September 08, 2005 5:57 PM
To: Standards (ITD)
Cc: campaigns@fsf.org
Subject: Adoption of OpenDocument Format

Someone recently sent me a Microsoft Publisher document. Unfortunately, I could not view the document, as I use SUSE Linux. Your decision to adopt the OpenDocument standard will go a long way toward helping to eliminate the problem of being able to share documents across multiple platforms.

Not everyone uses the same operating system, nor the same office suite.

People should not be railroaded into using one particular (and costly) application just because it makes it easier to share documents. Instead, the application vendors should support a standard document format that anyone can use.

I applaud the State of Massachusetts for taking the lead in adopting a standard that everyone can use, regardless of office suite or operating system.

Don Parris

--

DC Parris
Libre Software Advocate
www.thefreelyproject.org

From: c3souls@verizon.net
Sent: Friday, September 09, 2005 6:03 AM
To: Standards (ITD)
Subject: open Source Programming
Mr. Quinn,

I am writing in opposition to a change to open source programming because of the potentially negative impact it will have on employees and consumers with disabilities, particularly those who are blind and use screen readers. We believe the proposed change would fly in the face of the Americans with Disabilities Act, possibly leading to a loss of employment for some state employees who are blind.

Keith Willette
Chair
Commission on Disabilities
Shrewsbury MA



September 8, 2005

Peter Quinn
Chief Information Officer
Information Technology Division
Commonwealth of Massachusetts
Boston, MA 02133

Dear Mr. Quinn:

It is with pleasure that I write on behalf of the Open Source & Industry Alliance and its parent, the Computer & Communications Industry Association, to commend the Commonwealth for its choice of XML Specifications and Opendocument v. 1.0 for the Enterprise Information Technology Architecture.

As the Commonwealth is undoubtedly aware, XML is a suite of specifications that have been determined through a fully open, non-proprietary and royalty-free process under the aegis of the Organization for the Advancement of Structured Information Standards (OASIS). Opendocument, likewise, is unencumbered by royalty-bearing patents or copyrights that could exclude competitors. OASIS produces the XML and Opendocument standards with the help of numerous companies, not-for-profit organizations and outside experts.

Open technology development is of significant interest to CCIA and OSAIA. CCIA was founded in 1972 on the premise that information technology could not flourish as long as a single vendor controlled nearly the entire market for computer hardware. For more than 30 years we have successfully fought for "open markets, open systems, open networks, and full, fair and open competition" and against market abusers in the computer hardware, software and telecommunications sectors. CCIA played a key role in litigation against the IBM computing monopoly, the breakup of AT&T, and most recently antitrust actions against the Windows monopoly. The OSAIA project represents developers, users and others who benefit from open-source software. Members include many of the world's most prominent open-source companies and organizations, all of which support the right to use, develop, modify and share open source software.

While the term "open standard" has been used inconsistently in the past, there is an evolving consensus toward a strong definition that precludes the use of any kind of controls to advantage some vendors at the expense of others. This is especially true for applications involving the movement and exchange of information. Accordingly, the World Wide Web Consortium has established a policy supporting royalty-free standards. The European Commission's IDA (Interchange of Data between Administrations) has also adopted a strong definition of "openness" that guards against private manipulation of specifications.

When a given standard is open, all competitors may design their products to that standard, thus ensuring that a consumer using multiple products can rely upon their interoperability. Open standards are the *lingua franca* of the information technology industry. From HTML to TCP/IP of the Internet to ASCII text of the word processor, the existence of consistent data structures assures that software and hardware will work together predictably.

The openness of a given standard depends on the degree to which the underlying technology is visible and available to the developer. Royalties or other consideration required by patents or copyrights often further complicate the degree to which developers can use standards.

Open source software largely sprang from the repeated failure of supposedly open standards to fulfill their promise. Open source projects are analogous to open standards in that they allow everyone the right to examine, use, modify and redistribute the source code of a given software application. Such openness is often crucial to a competitive market. Without openness, companies that possess significant market power can leverage their dominance into new markets via dependencies whose workings are largely hidden from view. Such proprietary formats can lock in buyers to a product long after it has otherwise outlived its usefulness.

Massachusetts' proposed Enterprise Information Technology Architecture promises relief from vendor lock-in, while simultaneously assuring that no developer will be hindered in producing and processing common office documents. As far as we know, there is no other fully documented file format for routine office applications that includes as many useful features and is available to any vendor that might want to use it. Likewise, because the format is entirely open, fears of forward- and backward-compatibility should be nil; there will be no apparent economic incentive for any vendor to break compatibility in order to inflate demand for a new version of its software.

The product of this policy should be a market in which competition will be based on the ease with which users can produce and process documents that comply fully to the Opendocument v. 1.0 standard. It should not be one in which the power of an incumbent's trade secrets doom competitors from the start.

Today, one vendor controls well over 90% of the world's office software market. Such dominance is not just expensive, but highly durable because the file formats are not fully open. Since only one vendor can promise forward and backward compatibility with the installed base, there have been no serious contenders in the office software market for more than 10 years. Massachusetts' decision to mandate that all office software implement the Opendocument standard ensures that reliance on a single vendor will soon be broken. Henceforward, competitors in the Commonwealth will have to compete on the level playing field established by OASIS. CCIA and OSAIA hope that other governments will make similar decisions in the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Black', with a stylized flourish at the end.

Ed Black
President and CEO
Open Source and Industry Alliance
Computer & Communications Industry Association

From: Carlos Guevara [guevara@evolusoft.com]
Sent: Thursday, September 08, 2005 6:36 PM
To: Standards (ITD)
Subject: Massachusetts Open Document Format Is Bad for the State,
Taxpayers, IT Industry

Dear Mr. Quinn,

Your recent proposal to mandate an open-source-only data format (e.g., Open Document) for the Commonwealth's needs is unnecessary, wasteful, costly, taxpayer unfriendly, and harmful to the IT industry.

It is amazing to just about anyone with real computer knowledge the lengths at which some governments are going to make legislation that will supposedly cut costs, without understanding the real issues behind such proposals. Just look at what has happened in Munich, where the local government ended up spending nearly 30% more to go the "open" way than to use the same tools it already had. And that was just initially, since in two years they have not even been able to begin. Now they are having to undergo many pilot programs (that were not originally budgeted, but undoubtedly will add to the expense of the project) and they won't begin changing for another year or so because of it. Meanwhile their users have not been able to update their computer applications in that time and continue to suffer the consequences. Furthermore the costs keep going up.

Lastly, but probably more importantly, the "efforts" in place will still only help a handful of large corporations and hurt the smaller companies, since most smaller companies cannot compete in the "OPEN" model that IBM and a few others are spearheading, so most small companies will not be able to open up their source code, file formats, etc. The only thing proposals such as this is doing is preventing smaller companies from competing for government projects, and that hurts the smaller companies, the taxpayers and the governments, since they might be missing out on some great and creative new programs.

We respectfully urge that you reject this proposal outright.

Thanks for your attention to this important matter.

From: Scott McNealy [scott.g.mcnealy@sun.com]
Sent: Thursday, September 08, 2005 7:27 PM
To: Quinn, Peter J. (ITD)
Cc: Karen.Hallstein@sun.com; Standards (ITD); piper.cole@sun.com
Subject: Public Review Draft of the ETRM v3.5

Peter J. Quinn
ITD Director & Chief Information Officer Commonwealth of Massachusetts State House, Room 373
Boston, MA 02133

Dear Mr. Quinn:

I am writing on behalf of Sun Microsystems to support and applaud the Commonwealth of Massachusetts on the publication of the Public Review Draft of the ETRM v3.5. Both the process and the outcome provide thought leadership for the public sector across America and around the world.

We feel that requiring the use of an office document format, OpenDocument 1.0, which is standardized by a public process, completely free of legal encumbrances, already implemented in multiple products, not controlled by any one vendor, and on its way to being an ISO standard is enlightened and will pay long-term benefits to the citizens of Massachusetts.

These benefits include preserving office document accessibility to the widest audience and for the longest term; an affirmation of the value of open standards in preserving choice and interoperability in software applications. This is also evidence of the soundness of your Enterprise Open Standards Policy (http://www.mass.gov/Aitd/docs/policies_standards/openstandards.pdf) which outlines your rationale for adopting open standards.

Some may contend that the decision is unfairly dictating a software preference. This is entirely wrong; the guidelines make it clear that any applications need only support an open, unencumbered document format. Your guidelines do not limit any vendor's ability to compete for state business because the required open formats are available equally to all, and participation in their development is equally open to all.

In closing, we'd like to thank the Commonwealth for including us in this process. Please don't hesitate to call on Sun again in future.

Sincerely,
Scott McNealy
Chairman and CEO
Sun Microsystems, Inc.

From: Diane Fann [rdfann@earthlink.net]
Sent: Thursday, September 08, 2005 8:12 PM
To: Standards (ITD)
Subject: message to Peter Quinn

I oppose a change to open source programming because of the potentially negative impact it will have on employees and consumers with disabilities, particularly those who are blind and use screen readers.

Thank you for your attention.

Diane Fann

From: Henry Theberge [htheberge@globalsagegroup.com]

Sent: Thursday, September 08, 2005 10:33 PM

To: Standards (ITD)

Cc: 'Lebel, Robert (DPH)'; 'Tom Curran (DPH)'

Subject: ETRM Comments

Having implemented and migrated several large organizations to new standards I would offer the following comments.

Vision aspects

The move to embrace and standardize across the state on a finite set of standards is long overdue.

The past model of agencies determining their own standards, suppliers, products, etc., is expensive, and helps foster stove pipe organizations, redundancy of operations, and many other inefficiencies. Setting an SOA type architecture, aligns with consolidation and standard business services (e.g., licensing, enrollment, contracting, HR, Finance, POS).

The speed with which the enterprise can replace its legacy environment with new compliant systems is a function of the organizations ability to adopt change, be retrained, and resource availability (\$\$, experts, state employees, business leadership, policy change, etc.).

For example, replacing MS Office with any other office suite will impact productivity, require training, and require new experts for support.

If the entire migration is to be done by consultants, it will be expensive and state employees will be unable to support the new environment. The migration plan should involve evolutionary prototypes, involving state employees as key resources being mentored by experts.

Setting "Open Standards" as the standard is the right choice. The use of "open source" software must be managed as a higher level of risk.

Licensing, software ownership, software engineers, version management, complex integrated testing,

In the works is a Business readiness ratings system that will rate open source software. the state may wish to only use open source that has been sufficiently proven. Standardizing on any v1.0 or emerging standards is risky. For example XQuery.

There are pros and cons to being an early adopter - what is most important is a formal project management office and review board. The need for exceptions will be significant during the next few years as the vendors, standards boards, etc. all jockey for strategic position. We should also take a proactive role on key committees such as the OASIS government committee. New investments in new standards should be carefully measured - migrating all legacy to meet the new standard is typically financially unacceptable (simply changing for IT never really makes sense unless the business is ready to adopt the new system.)

Change to a complete new desktop set of tools will be expensive and cost significant productivity downturn. This needs to be carefully planned for by the secretariats and not by IT. Develop the business case to move to the new system.

Now - Some feedback on OASIS as a standard

The ANSI committee fully endorses the move to OASIS. Large players such as SUN and IBM have endorsed and have begun to build products in support of the standard. Others are dragging their feet.

There are other standards that also need to be included for Interoperability: HL7 has released an updated version of the HL7 Standard, which is the primary general healthcare information standard. Both HL7 V2 - the currently implemented version - and the newly released V3 will be in use for some time, so we intend to support both in our first release. DICOM (Digital Imaging and Communications in Medicine) specifies the standards relevant to medical imaging. A more complete standard should take into account other relevant standards, such as HL7's CDA and ASTM's CCR document standards. Other forms of meta-data representation such as schema, and OWL (W3C Web Ontology Language) should also be evaluated.

Not all OASIS standards are completely open and free - some may come with embedded costs...

"This policy from OASIS is as strong as the W3C policy in terms of specifying work to be royalty-free," said OASIS CEO Patrick Gannon in an interview. "Our policy states that standards may incorporate work that is patented, but that they have to disclose it. And in almost all cases, that results in a royalty-free license for that work." OASIS revised its policy to specify three modes for standards work: RAND, or reasonable and nondiscriminatory licensing; RF, or royalty-free, on RAND terms; or RF on limited terms.

Wouldn't it be better to work closely with the national government efforts in order to align with EOHHS, DOJ and others?

Extend Global JXDM to the National Level

The National Information Exchange Model (NIEM) will develop partnerships, provide collaborations, and present a unified strategy that will enable the entire justice and public safety community to effectively share information at all levels—laying the foundation for local, state, tribal, and national interoperability and joining together communities of interest.

Standards for electronic version control are still being defined

- GPO will acquire, authenticate, catalog, preserve, and provide access to all published versions of official and authentic electronic Government publications that have been approved for dissemination to the public and are within scope of the National Bibliography and the FDLP.
- Policies will be developed to address version control for different types of electronic resources (e.g. monographs, serials, series, databases, Web sites, video, audio, data streams, and multimedia).
- Version information will be stored in the metadata associated with a given publication. The metadata will include information about the version of the publication being described and alternate versions of the publication.

Setting new standards is not a one time effort. Standards are continually updated (IPv6 for example) and their impact need to be evaluated.

The goal is providing an effective, reliable, efficient, low-cost IT environment; the goal is not implementing open standards.

Henry Theberge

President, Global Sage Group

617-803-1277

From: Myra Ross [myraross@comcast.net]
Sent: Thursday, September 08, 2005 10:52 PM
To: Standards@state.ma.us.
Subject: No on open source programming

Dear Mr. Quinn,

I am a blind public school employee and resident of Massachusetts. I rely on the DOE website and use other state documents. I implore you not to move to Open Source programming before you learn for absolutely sure that the screen readers that blind people use can provide equal access to the information on Massachusetts websites. To make the change before blind expert users, of whom there are many in Massachusetts, have an opportunity to look into what you want to do and assure you that it is OK would be a breach of the public trust on your part, and it would not comply with the ADA either.

This is potentially very serious. Work with the blindness community to make sure that continued equal access is assured. Please do not hesitate to contact me about this.

Myra Ross
Amherst, MA
(413)253-2668

September 8, 2005

BY ELECTRONIC MAIL AND OVERNIGHT DELIVERY

Secretary Eric Kriss
Executive Office for Administration & Finance
State House, Room 373
Boston MA 02133

Mr. Peter Quinn
Chief Information Officer/Director
Information Technology Division
200 Arlington Street
Chelsea, MA 02150

Re: Proposed Revisions to Information Domain-Enterprise Technical Reference Model

Dear Secretary Kriss and Director Quinn:

Microsoft respectfully invites you to consider its responses to the proposed revisions to the Enterprise Technical Reference Model-Information Domain published on August 29, 2005 (ETRM) which, as currently framed, mandates exclusive use of a designated office document format within all executive agencies of the Commonwealth of Massachusetts by January, 2007.

Microsoft strongly supports the efforts of the Information Technology Division (ITD) of the Executive Office for Administration & Finance (ANF) to bring the benefits of XML to executive agencies of the Commonwealth of Massachusetts. We recognize that governments are challenged to be fully accountable for archived public records well into the future, and for ensuring that government agencies can efficiently handle data and documents across all technical and organizational boundaries. We share the opinion that XML is the ideal format for data interoperability and storage, management, and archiving of public records and endorse the direction to support open and agreed-upon specifications for data interoperability within government via XML standards. We share the proposal's goals for data interoperability across government agencies and for assuring proper storage and maintenance of all public records. Consistent with this viewpoint, Microsoft has been deeply committed to supporting XML within Microsoft Office for a number of years and continues to work with many governments around the world toward these goals.

We have substantial concerns, however, with the definition of "open formats" in the current proposal. This definition mandates adoption of a single, immature format for office documents throughout the Commonwealth's executive agencies and effectively requires deployment of a single office application technology within those executive agencies. As such, this unprecedented approach not only prevents impacted state agencies of the Commonwealth from using many critical and well-established technologies, but also runs afoul of well-established procurement norms without due

consideration for the enormous costs and technical challenges that stem from the proposal. We simply do not believe that the proposed mandate for this exclusive document format is the best solution for achieving the Commonwealth's laudable goals.

Microsoft's key concerns are as follows:

- (i) ANF did not provide sufficient time for review and comment on the proposed policy, nor a robust process for addressing comments. Due process requires much more, particularly given the unprecedented nature of the proposal and the potentially adverse consequences it could provoke,
- (ii) the proposed policy would create significant costs and problems for state agencies, for the private sector, and for its citizens,
- (iii) the document format designated in the proposed policy is new to the marketplace, still subject to potential revision, and not widely deployed or tested in a wide variety of product or usage scenarios,
- (iv) there are substantial technical challenges associated with implementation of the proposed policy. For example, there are issues associated with converting documents saved in the well-established, existing document formats which apparently have not been considered, including the possibility that the new policy will lock out citizens and organizations which use software applications supporting these existing formats from Commonwealth systems or services, or significantly change countless legacy documents that are not fully supported by the newly designated format,
- (v) the policy would prohibit impacted agencies of the Commonwealth from taking advantage of innovations and solutions from a multitude of technology vendors, including vendors whose technologies are now widely deployed throughout the Commonwealth, thereby denying these agencies the benefits of future technological innovations,
- (vi) the proposal appears both inconsistent and discriminatory in that it approves use of one "proprietary" document format as an alternative to the OpenDocument format, while excluding others, and
- (vii) there are less costly, less limiting, non-preferential policy options to achieve the proposed policy's stated goals. Of particular note, only months ago, the CIO's office publicly supported Microsoft's open and royalty free licensing approach with regard to its Office XML formats by agreeing to include these formats within the Commonwealth's policy. Now, with the imminent departure of Secretary Kriss at hand, the Commonwealth is proposing a policy that is at odds with its previous affirmation of Microsoft's approach. Such a sudden reversal by the CIO's office is questionable in its timing, process, motivation, and commitment.

In short, the proposed policy is costly and unnecessary and would limit the Commonwealth of Massachusetts to a desktop software policy that is less functional, less open, and less flexible than the Commonwealth's current policy.

For these reasons, as discussed in greater detail below, we believe the current proposal should be

reconsidered and that the ETRM section addressing data formats be revised in a manner consistent with the recommendations contained in this letter. In particular, we respectfully recommend that the ANF:

- 1) reinstitute its prior definition of “open format” that properly allowed for agency purchase of products based on openly licensed and widely deployed de facto standards as an equally effective means of fostering data interoperability,
- 2) reinstitute its prior conclusion that Microsoft’s Office XML Reference Schemas qualify as open formats under the Commonwealth’s policy (under this approach, the OpenDocument and PDF formats could also remain as viable alternatives), and
- 3) incorporate a process into the ETRM that makes clear how additional formats or standards may be added to the Commonwealth’s “accepted” list as developments and innovations arise in the future.

In the alternative, if the Commonwealth is not prepared at this time to adopt the specific substantive recommendations set forth above, we ask that you extend the current eleven (11) day period for public comments for an additional period of time sufficient to afford all interested parties an adequate opportunity to meaningfully review the proposal and provide thoughtful comments. During such time, we would also ask that the ITD commission an analysis of the costs and benefits associated with adopting the proposal as currently framed.

Following are the specific reasons why the proposed policy should be reconsidered, or, in the alternative, why the period for public comment on the proposed policy should be extended.

1. ***The Executive Office for Administration & Finance did not provide sufficient time for review and comment on the proposed policy, nor did it provide a robust process for addressing comments.***

The Commonwealth of Massachusetts has laws, regulations, and policies in place to assure that due process is followed on important matters with relevance for the Commonwealth and its citizens. It is unclear whether laws, regulations, and policies relevant to the current proposed policy were followed in this instance and we urge you to review this issue prior to final approval of the new policy.

The Massachusetts Administrative Procedures Act sets forth specific requirements for notice and comment processes before an agency promulgates any “rule, regulation, standard or other requirement of general application and future effect.” Given the mandate of the proposed policy, it appears that the APA may well apply to the proposed policy, and proceeding without a clear determination of whether it does would put the validity of the policy in doubt if adopted. Even if the APA does not apply, the due process protections it requires are appropriate, as matters of fairness and good policy making, for a shift as significant as the one ANF is contemplating here.

Indeed, the haste with which the current process is proceeding is inconsistent with the ANF’s own prior pronouncements concerning the diligence to be accorded technology procurement matters. Specifically, the ANF’s Enterprise Information Technology Acquisition Policy (Policy #: ITD-APP-

02) - Effective Date January 13, 2004 applicable to agencies within the Executive Department provides, in relevant part:

The Commonwealth has a responsibility to ensure that information technology solutions are selected based on best value after careful consideration of all possible alternatives including proprietary, public sector code sharing and open source solutions. ...For IT investments, a best value evaluation should, at a minimum, consider total cost of ownership over the entire period the IT solution is required, fit with identified business requirements, reliability, performance, scalability, security, maintenance requirements, legal risks, ease of customization, and ease of migration. ...IT investments should reduce the total cost of ownership to the Commonwealth while maximizing flexibility and reuse.

Regardless of whether the Acquisition Policy applies to the policy under consideration, it certainly informs the level of due consideration that the Commonwealth and ITD believe is appropriate with respect to matters impacting technology acquisitions.

The proposed revisions to the ETRM were first published for public comment by the ITD on August 29, 2005. The announcement accompanying the publication of the proposed policy indicated that the public comment period would end on September 9, 2005, just eleven days later. Moreover, the public comment period spanned a three day holiday weekend further compromising the ability of impacted citizens, organizations, and government officials to offer input on the proposed revisions. By contrast, the APA requires twenty-one days' notice.

As described below, the proposed policy represents a substantial departure from existing practice within the Commonwealth as it mandates deployment of a single, untested document format and, as a consequence, necessitates that executive agencies throughout the Commonwealth migrate away from software technologies that are widely deployed across these agencies in favor of different technologies. The enormity of the costs associated with this departure from existing practice cannot be discounted. It is almost unheard of for a government entity the size of Massachusetts to make such potentially far-reaching decisions about its IT infrastructure with so little time for public comment and discussion.

In light of the impact the proposed policy would have if put in place, it hardly seems appropriate to limit the public comment period to eleven days. Because the ANF failed to follow required procedures for engaging in this type of rule-making, any attempt to finalize the proposed policy would be invalid. Proposing a single standard technology to the exclusion of all others with an 11-day comment period hardly seems consistent with this overlying goal. Accordingly, if the Commonwealth is not prepared at this time to adopt the specific substantive recommendations set forth in this letter, we ask that, at the very least the Commonwealth extend the comment period for an additional period of time sufficient to afford all interested parties an adequate opportunity to meaningfully review the proposal and provide thoughtful comments and that, during this time, the Commonwealth conduct and publish for comment a thorough evaluation of the costs and benefits associated with the proposed revisions to the ETRM before making any revisions to the current policy. It bears noting that the APA would require ANF to file a five-year estimate of the policy's fiscal effect on both public and private sectors before the policy takes effect. We are unaware of any such estimate having been prepared.

In proceeding unilaterally to mandate use of a single document format, ANF's proposal is also

inconsistent with Section 390 of Chapter 149 of the Act of 2004, which is legislation passed just last year to create an information technology advisory board to guide the development of IT policy throughout state government. As you know, the advisory board consists of representatives from all three branches of government and is charged with developing annually an inter-branch memorandum of understanding that sets forth “information technology standards and a strategic plan for the signatories’ acquisition and use of information policy.” The statute also provides that Mr. Quinn is to be advised by the board on information technology issues, including the development of policies, project selection criteria, information technology architecture, infrastructure, and investments. By proceeding entirely outside the advisory board process, as we understand to be the case, ANF is acting in apparent conflict with the provisions of Chapter 149, Section 390 and thus casting further doubt on the ultimate validity of the regulations.

2. *The proposed policy would impose enormous costs on the Commonwealth of Massachusetts and on its citizens and the private sector.*

If the proposed policy were put in place, the fiscal impact on the Commonwealth, its citizenry, and the private sector would be substantial.

First, there would be significant, and entirely unnecessary, costs incurred by all state agencies, departments, cities, counties, and school districts to procure new software applications that support the OpenDocument format for their individual users. Many state agencies already have licenses for Microsoft Office and other software products that do not support the OpenDocument format, and the expense already borne by these state agencies for Microsoft Office and such other products’ licenses would be wasted by disallowing use of these products after Jan. 2007.^{1 2} As a result, costs to taxpayers would rise as executive agencies would be forced to toss out software they have already paid for, that they already know how to use, and that they can already use for archiving in open standard XML formats.

Second, every state agency, department, city, county, and school district would face enormous document and/or application conversion costs and would need to invest in training and support activity in order to make this conversion, with potential risks arising from conversion errors in these public documents.

Third, extensive work would have to be done deep within the IT infrastructure of the Commonwealth

¹ The impact of this proposal extends far beyond Microsoft. For example, agencies that have chosen to make use of Corel software, such as the Massachusetts court system, will face similar challenges, and it is unknown how the proposed policy will adversely impact existing guidelines in place for such agencies, such as the Massachusetts court system’s electronic submission guidelines.

² Some may argue that lower licensing costs associated with software technologies supporting the OpenDocument format counters the cost associated with the migration. Recent Gartner analyst reports, however, have documented examples where organizations who have closely evaluated the issues conclude that a move to alternative software has no defensible ROI; in fact, those organizations have concluded that the preferred approach was to maintain and continue deployment of Microsoft’s most recent software technologies. See: [A Financial Institution Sees No ROI on Desktop Linux](#) In many cases, companies license technologies for “free” or at very low sales price in the hopes of making money on other related products and services including sales of complementary proprietary software and hardware and service contracts. There are a number of examples of government entities that migrated away from some of the software that will be supporting the OpenDocument format due to total cost of ownership (including testing and installing, and training costs) among other factors.

to manage conversions of “non-compliant” documents and mapping of processes that work well today to new, untested systems. On a daily basis, state agencies would need to work with private sector organizations and citizens to devise ways to convert documents back and forth and to troubleshoot problems. One could also assume that other branches of the Commonwealth’s government would incur substantial expenses in order to adapt IT systems to be able to interface with the overhauled systems of the executive branch.

Fourth, new costs and problems will also be imposed on those doing business with the state, including organizations, businesses, and citizens, as the proposal could take away their choice of the software they may want to use to interact with the government to, for example, bid on a government project, submit filings, or correspond with government officials. Further, Massachusetts companies who currently sell products that do not comply with the proposed policy to Massachusetts agencies will be cut off from a major customer base.

Indeed, the proposal itself acknowledges the current pervasive deployment throughout impacted agencies of technologies not compliant with the proposed policy and the magnitude of the resulting costs that would be associated with the migration effort:

Given the majority of Executive Department agencies currently use office applications such as MS Office, Lotus Notes and WordPerfect that produce documents in proprietary formats, the magnitude of the migration effort to this new open standard is considerable.

There is simply no principled basis for causing the foregoing costs to be borne by the Commonwealth, its citizens, and the private sector, particularly given a) the significant flaws with the OpenDocument format, and b) the availability of more cost effective alternative ways to achieve the Commonwealth’s principal data interoperability objectives. These issues are discussed in turn in the following two sections.

3. *The OpenDocument format is immature and not widely accepted in the industry or public sector, and mandating the adoption of this format would present affected state agencies with significant technical obstacles.*

The new policy commits affected agencies to a relatively new and therefore not widely adopted or deployed technology.³ No other government entity in the U.S. has made similar policy moves. And for good reason: the technical specifications for the OpenDocument format were just recently finalized by a working group of the OASIS standards group on May 1, 2005, and have not been widely adopted, particularly across a range of organizations with varying infrastructure, skills, requirements and needs as is the case here. Furthermore, the open document committee of the OASIS umbrella organization did not include any government representatives and was comprised of a very narrow set of companies, primarily Sun and IBM, which are promoting their own technologies. The specifications were recently submitted to the ISO standards group and could be further modified

³ See J. Wilcox at <http://www.microsoftmonitor.com/archives/010242.html> (“Considering the OpenDocument format is only truly supported by OpenOffice 2.0, which isn't even available yet, I'm at a loss to see how the XML-based format meets the Commonwealth's goals for openness or backward compatibility. Nobody's *really* using the format yet, right? How, uh, open is that?") In point of fact, Microsoft is unaware of any released and supported software products that currently write to the OpenDocument format.

there.⁴

Beyond the immature and parochial status of the OpenDocument format, the format also promises to expose affected state agencies to significant technical obstacles, thereby potentially compromising the ability of affected state agencies to satisfy their technology-related obligations.

First, the proposal works against the practical considerations of storage and management of public records and ignores the many benefits that the state can derive from more innovative software than the choice designated in the proposal. There are likely to be millions of documents held by state agencies that are not in the OpenDocument format, but will nonetheless need to be converted for the future without jeopardizing their integrity. Unlike Microsoft Office formats, the OpenDocument format was not developed to provide backward compatibility in full fidelity from old Microsoft file formats. The current proposal would thus leave affected Commonwealth agencies with very limited capability for converting existing documents, relegating them to conversion into a less functional document standard. By contrast, the Microsoft Office formats pay special attention to compatibility with older document versions so that our customers can not only take advantage of the power of XML, but also transition their billions of existing documents to a format that ensures that their data and all the features, attributes, functions, and data types of these documents are preserved in the new format.

Second, unlike the support for data integration offered by Microsoft Office, the OpenDocument format does not have a universal means to incorporate external XML data sources in their native format into all types of documents. Therefore, much of the work the state will do to standardize their data via XML formats will not be easily accessible within most documents. Data may be lost as it is entered into documents, and documents may not be able to be generated automatically with data from other systems. The proposed policy sets up two isolated approaches to interoperability, one for data and one for documents, without a bridge between them. By contrast, Microsoft Office supports such universal *integration* of customers' "native" XML schema, and therefore could potentially better serve the stated data interoperability requirements.

Third, the OpenDocument format lacks a number of capabilities that are increasingly important in modern computing environments. Modern documents need to be able to handle embedded pictures, audio, video, maps, voice, data, database schema, web pages, and other data types. The ETRM proposal acknowledges that these needs are not yet addressed. Similarly, the proposal does not address the integration of documents with communication, collaboration, messaging, document management systems or other applications. In short, by limiting state agencies to the use of specific technology, the proposal will simply penalize agencies by prohibiting new useful technology advancements, whether from Microsoft or other sources.

4. *A preference for the OpenDocument format commits the Commonwealth to a single specific technology choice, which contravenes well-established public sector procurement practice, as well as various Commonwealth statutes and regulations.*

The draft policy identifies four products that support the OpenDocument format: Sun's StarOffice,

⁴ Note that the need for additional testing of Linux and OpenOffice.org recently caused Munich to delay its migration to these products for a year. See http://news.com.com/Munichs+Linux+migration+slips+to+2006/2100-7344_3-5850633.html.

OpenOffice.org, KOffice, and IBM Workplace. In reality, these products are slight variations of the same StarOffice code base, which Sun acquired from a German company in 1999. The different names are little more than unique brands applied by the vendors to the various flavors of the code base that they have developed. In essence, a commitment to the OpenDocument format is a commitment to a single product or technology. This approach to product selection by policy violates well-accepted public procurement norms.

Forcing a procurement preference for a single file format on government agencies will neither improve interoperability for public records, nor result in lower costs to taxpayers. Commonwealth agencies should be allowed to choose the technologies that best suit their needs, particularly in a context where, as here, multiple open and competing technologies/formats are available and supported in the marketplace, with many document conversion utilities already available and with no licensing barriers to future conversion software.

It is also possible that the proposed policy violates applicable Commonwealth statutes. The statute which empowers the ANF Secretary to conduct and oversee procurement for the Commonwealth requires that the ANF Secretary create rules for “the stimulation of competition.” The proposed policy can be read to require deployment of a single technology, to the categorical exclusion of vendors of alternative technologies. For example, the policy clearly calls for Corel and Microsoft products to be phased out without putting in place a process for updating the policy to accommodate additional technologies or standards. Because the proposal would thereby *reduce* competition, it is arguably invalid as beyond the ANF Secretary’s statutory authority.

Likewise, the proposed policy likely conflicts with current Commonwealth procurement regulations. The ANF Secretary’s existing procurement regulations are based on the ANF Secretary’s so-called “Procurement Principles,” which generally seek to obtain “Best Value” through competitive bidding, proactive planning, and needs assessments, and flexible bidding structures. In mandating categorical use of a particular technology/format, the proposed policy thus also conflicts with these existing regulations (which require consideration of, at a minimum, total cost of ownership over the entire period the IT solution is required, fit with identified business requirements, reliability, performance, scalability, security, maintenance requirements, legal risks, ease of customization, and ease of migration), and would therefore be invalid on this basis as well.⁵

While one might casually suggest that other companies simply provide “native” support for the OpenDocument format, the reality of the situation is that incorporating native conformance for the OpenDocument format, as required by the proposed policy, would be enormous and time consuming and, perhaps more importantly, cause these companies to limit themselves to the OpenDocument format vs. other more capable or more useful XML-based formats.⁶ For example, Microsoft has spent

⁵ See *Enterprise IT Acquisition Policy*. January 13, 2004 (available at http://www.mass.gov/portal/index.jsp?pageID=itdterminal&L=3&L0=Home&L1=Policies%2c+Standards+%26+Legal&L2=Open+Standards&sid=Aitd&b=terminalcontent&f=_policies_standards_it_acquisition_policy1&csid=Aitd). For example, suppose that under such an objective analysis, Microsoft’s Office product, including its XML-based file format, was the superior product under the Commonwealth’s Enterprise IT Acquisition Policy. It would seem that the mandatory and exclusive nature of the revised ETRM directing agencies to purchase *only* applications that provide native conformance for OpenDocument would undermine this well-established Commonwealth policy.

⁶ This is particularly true since the proposed policy requires use of OpenDocument as the *default* file format, which will only exacerbate the significant confusion and compatibility concerns Microsoft describes above in

over five years building its XML capabilities into its current generation products. These capabilities are designed to support a broad range of interoperability, in addition to support past formats now in use by millions of customers.

At bottom, while the draft policy speaks in fairly arcane terms about document formats, its implications from a product standpoint are clear: there is really only one product that only partially satisfies the Commonwealth's draft policy and other companies that have invested years of work and millions of dollars in developing alternatives are left out in the cold.

5. ***The current proposal constitutes a significant and unjustified departure from the Commonwealth's prior policy, adopted earlier this year, under which de facto format standards, such as Microsoft's Office XML Reference Schemas, could also qualify as "open formats."***

The principal rationale for the proposed revisions to the ETRM relating to data formats is ensuring access to public records into the future. To that end, the proposed revisions to the ETRM provide:

Open formats for data files ensure that government records remain independent of underlying systems and applications thereby preserving their accessibility over very long periods of time...Electronic records are stored by agencies most often in proprietary formats that jeopardize the long-term accessibility of those records.

While we strongly support the stated goal of ensuring continued access to public records, we take issue with the notion that this goal is capable of being met solely by a single document format. Notably, "de facto standards" - *i.e.*, technical specifications developed and maintained by a single entity or by a private, small group of cooperating entities - that are available through publication and licensed under commercially reasonable terms (*e.g.*, Adobe's PDF Format, Microsoft Office XML File Formats, Java, and Win 32 APIs), can also achieve this goal, as well as the broader objective of fostering interoperability among heterogeneous applications or systems.

Until very recently, the Commonwealth's policy was predicated on precisely this view. In fact, the definition of "open formats" included within the proposed revisions to the ETRM represent a significant departure from the state's current policy on "open formats" which was put in place just earlier this year. Specifically, only eight months ago, at a January 15, 2005 Massachusetts Software Council event, Secretary Kriss posited an open formats definition that expanded the concept of open formats to encompass certain "proprietary" formats, including Microsoft's Office XML Reference Schemas, that bore characteristics that made them likely to ensure continued accessibility to public records:

Open Formats are specifications for data file formats based on an underlying open standard, developed by an open community, and affirmed by a standards body; or de facto format standards controlled by other entities that are fully documented and available for public use under perpetual, royalty-free, and nondiscriminatory terms. (emphasis added)

light of the inability of the OpenDocument format to fully and faithfully implement all the features in countless existing legacy documents.

At that same meeting, ANF Secretary Kriss noted that Microsoft's Office XML Reference Schemas would likely qualify as open formats and be included in the next open format standard issued by the Commonwealth to the extent Microsoft made certain clarifications to its license agreement for the Microsoft Office XML Reference Schemas which clarifications were part of an ongoing dialogue between Microsoft and the Commonwealth:

We have been in a conversation with Microsoft for several months with regard to the patent that they have on, and the license surrounding their use of, XML to define the schema of DOC files in Microsoft Office 2003. They have made representations to us recently they are planning to modify that license, and we believe, if they do so in the way that we understand that they have spoken about (we will leave it obviously to them to describe exactly what they are going to do), it is our expectation that the next iteration of the Open Format standard will include some Microsoft proprietary formats. These formats, like DOC files, will be deemed to be Open Formats because they will no longer have restrictions on their use. That would potentially include (again, we need to wait for the final designation of this by Microsoft) Word Processing ML, which is the wrapper around DOC files, Spreadsheet ML, which is the wrapper around XLS files, and the form template schemas.

See http://www.mass.gov/eoaf/open_formats_comments.html.

Following this statement, and as a result of the ongoing discussions between ANF and Microsoft, Microsoft clarified the language of the license to the Commonwealth's satisfaction. As a result, the existing policy of the Commonwealth of Massachusetts, which the policy under consideration would replace, endorses Microsoft Office XML Reference Schemas as a qualifying "open format." The current policy of accepting openly documented, royalty-free licensed formats for use by state government accomplishes a high level of interoperability immediately, without forcing a costly "rip and replace" effort throughout the state; it also enables room for future innovations while allowing for continued improvement in state government standard practices. Accordingly, any revisions made to the ETRM regarding data formats should be consistent with the current non-exclusionary policy regarding data formats.⁷

In this regard, it is worth highlighting that the proposed revision to the ETRM also approves Adobe PDF as an "other acceptable format" for certain purposes even though it is a commercial/proprietary format that was not affirmed by a standards body. Approving some formats such as PDF that do not meet the revised ETRM's primary "openness" definitional criteria while eliminating other such "de facto" open formats like Microsoft's Office XML Reference Schemas (or its upcoming Office 12 Open XML Format) is entirely arbitrary and cannot be reasonably justified. At the same time, Microsoft submits that this treatment of PDF confirms the Commonwealth's continued recognition

⁷ This current policy is also consistent with the conclusions set forth in the Commonwealth's June 9, 2005 "Open Formats Summit Notes" that 1) there is no one definition of the term "open" and rather there is a "continuum of openness," and 2) "among the issues to be considered in defining criteria for openness are licensing, functionality, interoperability, and open process (including peer review) for creating and maintaining the standard on which the format is based. Practical issues for the Commonwealth to consider in choosing the degree of openness to adopt are migration, backward and forward compatibility, and the marketplace."). Under this reasonable approach, particularly the criteria regarding licensing, functionality, interoperability, migration, backward and forward compatibility, and the marketplace, the Microsoft Office XML-based file formats clearly constitute an open format, as the Commonwealth rightly concluded.

that even under the revised ETRM, de facto formats *can* be acceptable vehicles for achieving the policy's central goal of ensuring continued access to public records. Although Microsoft does not object to the identification of PDF as an acceptable format, it strongly objects to having its Office XML formats precluded from the proposed revision to the current policy. This is particularly so because the Microsoft Office XML formats (both the current Office 2003 XML Reference Schemas and the Office 12 Open Format) are equally if not more "open" than the PDF format, as well as the OpenDocument format. Below are the key criteria clearly demonstrating the openness and interoperability of Microsoft's Office file formats:

- Microsoft has taken unprecedented steps to fully describe through a completely W3C-compliant XML structure the way the current editions of Microsoft Office docs are represented when saved as XML. The first time Microsoft worked with XML was in Office 2000 (development started in 1997), and the upcoming Office 12 file format will see the first time XML is used as a *default* file format in Office products (as opposed to the "binary" formats, *i.e.*, .doc for Word, .xls for Excel, and .ppt for PowerPoint).⁸ This approach enables full integration by any technology provider and full use by any customer to read and write using the Office XML schema. Indeed, by Microsoft moving to an XML-based format for Office, its competitors are able to transform the Office XML into any other format they want. Moreover, the main products out in the marketplace -- WordPerfect, Lotus, OpenOffice, etc. -- should all be able to use our licenses and documentation to build in support for the Office XML formats. Our primary goal at Microsoft was to create an open format that fully represented all of the features that our customers have used in their existing documents, documents that have been created using the existing Office products over the past couple decades. Office has over 400 million customers, and we have a responsibility to continue to support all existing documents and all the existing functionality. There are billions of documents that we are going to help move into our new XML formats, and so a key constraint on all of our efforts was that these new formats had to support *all* those existing files and features with absolutely no loss.⁹ To frame the magnitude of the undertaking, we have more than 1600 XML elements and attributes that reflect the features in Word alone in Office 2003. This is why we had to design a new format instead of shoehorning our features in another existing format. (By contrast, as noted, the proposed revision to the ETRM policy *ignores* the practical reality that there are billions of existing documents already in Microsoft Office and other well-established formats that must have a natural way to evolve to an open format in full fidelity.)

⁸ See Press Release on Microsoft Office 12 XML Formats (*available at <http://www.microsoft.com/presspass/press/2005/jun05/06-01OfficeXMLFormatPR.msp>*); FAQ on Microsoft Office Open XML Formats (*available at <http://www.microsoft.com/office/preview/filefaq.msp>*). For more background on the Microsoft Office 12 Open XML-based file formats and a comparison to the OpenDocument format, see Brian Jones's blog at http://blogs.msdn.com/brian_jones/default.aspx.

⁹ The Microsoft Office 12 Open XML Formats will work for all those billions of Office documents that already exist today. Microsoft is going to provide bulk upgrade converters that allow you to easily convert from the binary formats into the XML formats. Everything that you could represent in the existing binary formats you will be able to represent in XML. This means all features and functionality that people have come to expect from their office products will be stored in XML. This was a huge undertaking as the Office applications are very large, and while most people only use certain features, each person uses a different set, and in the end all features are used.

- Microsoft explored many different licensing approaches when we designed our XML file format licensing program. Our guiding principle was that we wanted to make our program mirror approaches commonly used in the standards community to achieve the degree of openness requested by customers and the industry. The following elements of our program are the pillars of this approach:
 - The technical documentation is available on the Internet for anyone to copy and read
 - The license for all current and future essential patent claims is royalty-free
 - The license is perpetual -- Notably, Microsoft has committed to continue this licensing effort with respect to *future* XML schema, so any claims that the Microsoft Office formats may lead to “lock-in” are baseless
 - The license is very brief and available to anyone (*see* <http://www.microsoft.com/mscorp/ip/format/xmlpatentlicense.asp>)

- We believe the above characteristics led Valoris to state the following: *“The MS license provides access to the schemas and full documentation to interested parties and is designed for ease of use and adoption. In this regard the MS XML Reference schemas satisfy the requirements [of openness]”* This view was further confirmed recently by an independent third-party analysis of our license program. Erik Stasik, the former director of patents and licensing for Ericsson, reviewed the Office XML licensing program in his recent publication entitled “Strategic Patent Planning for Software Companies.” He concluded “[t]he [Microsoft Office XML Schema] license is relatively straightforward, royalty free, and even less demanding than the license offered under the W3C’s patent policy.” He further observed that the Microsoft licensing approach “*make[s] it more attractive for a small company to develop applications based on the Office Schemas*” than the open source Apache license. We believe the broad acceptance of our program to date and the strong signs of further adoption of the Office XML schemas within the industry demonstrate the effectiveness of this approach.

- Microsoft’s open approach with regard to its Office XML Reference Schemas, which enables any vendor to establish interoperability with Microsoft Office documents, has also been reviewed and endorsed by the European Union’s Interchange of Data between Administrations (IDA), a key technology committee from the EU, as a way to ensure the public has easy access to public-sector information and services. More information is available at this site: <http://www.microsoft.com/office/xml/default.mspx>.

- While it is true that OpenDocument has been adopted by OASIS, it is also worth noting that the OASIS committee that pushed the latest OpenDocument format as a standard has vested, proprietary interests in promoting OpenOffice 2.0. Two employees of Sun, which develops OpenOffice, serve as the chairman and secretary of the committee, and two employees of IBM, which sells versions of OpenOffice, occupy seats on the small committee. Seen in this light, it is tenuous at best to suggest that the mere adoption of the OpenDocument standard by this small and highly parochial committee within OASIS renders this standard format more “open” than the Microsoft Office XML-based formats.¹⁰ .

¹⁰ Thus, those who claim that OASIS welcomes every entity to participate and that Microsoft could have simply worked with OASIS’s OpenDocument committee to ensure that its extensive feature set was represented in this new standard and that its substantive concerns (such as backward compatibility with legacy formats) were addressed are ignoring the plain realities of the situation. The OpenDocument format is essentially a commercial

- It is equally disingenuous for parties to claim that the fact that the Microsoft Office format may be covered by a patent renders it non-open. First, as noted, all current and future necessary patent claims are licensed on a perpetual, royalty-free basis.¹¹ Second, the terms of Microsoft's license are consistent with the approach to licensing set out in the W3C, OASIS, and countless other open standards IPR policies. Third, as well-respected organizations such as ANSI and ITU-T have recently explained, the fact that a standard is covered by a patent does not mean the standard is not open, so long as the patent is licensed to all implementers of the standard on reasonable and non-discriminatory terms. (See ANSI at http://www.ansi.org/about_ansi/introduction/introduction.aspx?menuid=1; ITU-T at <http://www.itu.int/ITU-T/othergroups/ipr-adhoc/openstandards.html>). Finally, we note that the OpenDocument format *itself* is covered by essential patent claims owned by Sun for the OpenOffice.org XML File Format Specification, and that Sun licenses these essential claims under a royalty-free license that is quite similar to the Microsoft royalty-free license. (see Sun license at <http://www.oasis-open.org/committees/office/ipr.php>; also see comparison of Microsoft and Sun licenses at <http://nfocentrale.net/orcmid/blog/2005/06/microsoft-ox-vs-oasis-od-is-it-really.asp>).

In short, regardless of how one analyzes the issue, the conclusion is clear: The Microsoft XML-based formats are open formats that should be incorporated as accepted formats under the Commonwealth's policy.

Recommendations

1. Proposed Definition of "Open Formats"

Microsoft respectfully urges ANF to endorse the following definition of "open formats," one that would avoid the shortcomings in the ANF's definition of "open formats" contained in the proposed policy:

Open Formats are specifications for data file formats based on an underlying open standard, developed by an open community, and affirmed by a standards body; or de facto format standards controlled by other entities that are fully documented and available for public use under perpetual, royalty-free, and nondiscriminatory terms. (emphasis added)

In contrast to the proposed definition in the revised ETRM, this definition of open format is consistent with public pronouncements of ANF made just earlier this year.

product backed by Sun and IBM masquerading as an open standard, and that there was no realistic possibility that this committee was interested in revising its specifications to address the features, backwards compatibility, and other serious issues that are at the heart of Microsoft's concerns regarding its existing customers.

¹¹ The Microsoft FAQ on this royalty-free license makes perfectly clear that any patent rights that Microsoft may have now or in the future that may cover its XML-based file formats will not give rise to lock-in concerns. See <http://www.microsoft.com/Office/xml/faq.msp>.

2. Proposed Treatment of Microsoft Office XML File Formats

ANF should also reinstitute its prior conclusion that Microsoft's Office XML Reference Schemas qualify as open formats under the Commonwealth's policy. This conclusion is fully justified by the marketplace facts and the perpetual, royalty-free license that Microsoft has adopted for these formats, all of which demonstrates their true and enduring openness. To be perfectly clear, Microsoft is not endorsing adoption of its format as the sole or exclusive format in the ETRM. Rather, we encourage having OpenDocument and PDF as other accepted open formats. This approach is good for competition, and good for the Commonwealth and its citizens.

3. Incorporate a Dynamic Process in ETRM to Accommodate Future Developments

Given the vibrant nature of competition in the IT industry and the fast pace under which developments and innovations occur, it is imperative that the ETRM incorporate a process that makes clear how additional formats or standards may be added to the Commonwealth's "accepted" list as such developments and innovations arise. Otherwise, the ETRM and the process itself will become an inadvertent road block to such positive developments.

If the Commonwealth is not prepared at this time to adopt the specific substantive recommendations set forth above, we ask that, at the very least the Commonwealth extend the comment period for an additional period of time sufficient to afford all interested parties an adequate opportunity to meaningfully review the proposal and provide thoughtful comments and that during this time it conduct and publish for comment a thorough evaluation of the costs and benefits associated with the proposed revisions to the ETRM before making any revisions to the current policy. Given the significant due process, cost, competing standards, and other considerations raised above, this is the minimal course the Commonwealth must take to properly and meaningfully study the potential impact of the unprecedented proposals it is contemplating.

Conclusion

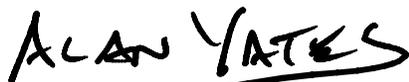
Microsoft has serious concerns about the proposed revisions in the ETRM ver 3.5 regarding open formats. Most critically, if the revised ETRM's proposed definition of "open format" were adopted, numerous technologies that have been widely deployed throughout the Commonwealth of Massachusetts and elsewhere across the globe would no longer be available for use by state executive agencies. This would have significant negative implications for the Commonwealth and would undermine the ANF's goal of controlling costs and fostering competition.

Moreover, there is no principled basis for the Commonwealth to adopt these unprecedented revisions -- which would abruptly reverse course from the reasonable one charted by the Commonwealth earlier this year, and prescribe an immature and untested open format as a complete replacement for well-established open formats, such as Microsoft Office's XML-based formats. Were this proposal to be adopted, the significant costs incurred by the Commonwealth, its citizens, and the private sector would be matched only by the levels of confusion and incompatibility that would result from the fact that the OpenDocument format is such a nascent and immature format.

Microsoft appreciates your consideration of these comments and the specific recommendations set out above and commends the Executive Office for Administration and Finance for its efforts to extend the use of XML throughout Massachusetts executive agencies. Microsoft stands ready to work with the ANF to further contribute to revising the ETRM to respond to the comments set forth above, and to

engage fully and collaboratively with the ANF and other entities of the Commonwealth of Massachusetts to promote the goals of interoperability and continued access to public records in the digital age.

Respectfully,

A handwritten signature in black ink that reads "ALAN YATES". The signature is written in a cursive, slightly slanted style. Below the signature is a long, horizontal, slightly curved line that underlines the name.

Alan Yates
General Manager
Microsoft Corporation

Cc: Governor Mitt Romney
John O'Keefe

From: Ravi Khalsa [ravi@tangoaz.com]
Sent: Friday, September 09, 2005 6:59 AM
To: Standards (ITD)
Subject: Thank You!

Hello,

Regarding ITP-APP-01 Enterprise Open Standards Policy, thank you!
This policy will help everyone in government and private enterprises begin to recognize the tyranny and folly of proprietary document formats. Thank you for leading the way!

Ravi Khalsa
7133 North 14th St
Phoenix, AZ 85020
602-678-0743

From: Doremus, Jan (MCB) [Jan.Doremus@state.ma.us]
Sent: Friday, September 09, 2005 8:20 AM
To: Standards (ITD)
Subject: Oppose Open Source Programming

Dear Mr. Quinn,

I am a state employee who is blind. I oppose a change to open source programming because of the potentially negative impact it will have on employees and consumers with disabilities, especially those who are blind and use screen readers. We believe that this proposed change would fly in the face of the Americans with Disabilities Act, possibly leading to the loss of employment for some state employees who are blind.

Please reconsider this proposal and do not make this change to open source programming.

Thank you for your attention to this matter.

Sincerely,

Jan Doremus

From: Access Systems [accessys@smart.net]
Sent: Friday, September 09, 2005 8:38 AM
To: Standards (ITD)
Subject: open source software and blind

Sir

I fail to see what the big problem is with Open Source Software and Linux in particular and visual

impairment, Linux is accessible and has been for many years, all the information concerning this is located at the open source blind website <http://leb.net/blinux/>

the only thing I can think (and I am a person with a disability and have used linux exclusively for over 5 years) is that people are afraid of having to learn something new. Most current access equipment works as well or better under a Linux operating environment.

the other possibility is a common attack method, we refer to as FUD. (fear, uncertainty and doubt) by spreading false rumors companies making large sums of money producing specialty software are afraid they will be found out and that there is free software that is just as good, but because it is free it doesn't have the marketing budget so they are not as well known.

Please do not be scared off by the FUD spreaders.

Bob Reuter

+++++
CONFIGURE YOUR E-MAIL TO SEND TEXT ONLY, see <http://expita.com/nomime.html>
+++++

"They that can give up essential liberty to obtain a little temporary safety deserve Neither liberty nor safety", Benjamin Franklin

- - - - -
ASCII Ribbon Campaign accessBob
NO HTML/PDF/RTF in e-mail accessys@smarnospam.net
NO MSWord docs in e-mail Access Systems, engineers
NO attachments in e-mail, *LINUX powered* access is a civil right
*#####

From: Robert Baran [rbaran@hcc.mass.edu]
Sent: Friday, September 09, 2005 8:40 AM
To: Standards (ITD)
Subject: oppose open source programming
I oppose a change to open source programming.

I am blind and have used assistive technology for my education and past 10 years of employment at Holyoke Community College.

source programming
Robert R. Baran M.Ed.
Assistive Technology Specialist
Holyoke Community College
303 Homestead Avenue

Holyoke, MA 01040
Phone: (413) 552-2156
rbaran@hcc.mass.edu

From: Dan Stoner [dstoner@flmnh.ufl.edu]
Sent: Friday, September 09, 2005 8:55 AM
To: Standards (ITD)
Cc: campaigns@fsf.org
Subject: I strongly support your Open Standards for Information

Just wanted to indicate my support of your Open Standards.

I'm sure you are aware that Microsoft software is often advertised as being "standards compliant" or participating in open standards. Any of us who have been in the business for a while know that this is not true.

Microsoft often extends the standards in ways that make real standards-based information exchange impossible.

Be careful when Microsoft calls to tell you that their software fully complies with your OpenDocument standard. They will tell you that there is no reason to change the software that is installed on your desktops.

Every day that the Microsoft software is allowed to reside on your computers you are allowing new information to be stored in proprietary data formats.

I wish you luck and all due haste in progressing with your project.

Dan Stoner
Network Administrator
Florida Museum of Natural History
University of Florida

From: Dohner_Silva [lukebela@yahoo.com]
Sent: Friday, September 09, 2005 10:23 AM
To: Standards (ITD)
Cc: mwendy@comptia.org
Subject: Open Source GOOD Mass Open Document Format Is GREAT for the State, Taxpayers, IT Industry

Dear Mr. Quinn,
Great idea!

Your recent proposal to mandate an open-source-only data format (e.g., Open Document) for the Commonwealth's needs is necessary, energy saving, cost effective, taxpayer friendly, and helpful to the IT industry.

I respectfully urge that you expand this proposal.

I believe the use of open source applications, such as word processing and spread sheet apps would save the taxpayers millions of dollars.

Also they work better than those buggy Microsoft apps.

Why should Microsoft have a monopoly on our future?

Thanks for your attention to this important matter.

Luke Dohner

Luke Dohner
Digital Arts and Development
New York City

From: Zeolla, Martha (MRC) [Martha.Zeolla@state.ma.us]

Sent: Friday, September 09, 2005 10:43 AM

To: 'Standards@state.ma.us'

Subject: I oppose Commonwealth changing to Open source, to Linex

Dear Peter,

I am told that this will be devastating for blind employees of the state. I am a supervisor at MRC. Two of our employees use speech recognition software, and have enough accommodation problems now. Please reconsider.

Thank you,

Martha Zeolla, L.R.C.

Supervisor

From: Wyley Robinson [wyley@netscape.net]

Sent: Friday, September 09, 2005 11:26 AM

To: Standards (ITD)

Subject: re: Enterprise Technical Reference Model v.3.5

I support the Enterprise Technical Reference Model v.3.5.; here is my reasoning:

For any large organization, the ability to share information is critical. In the case of government, it is imperative that much of the information developed at taxpayers' expense be easily shared with its citizens. Using Open Standards is the most responsible approach in meeting these goals.

It is not that Open Standards are better than proprietary standards. It is that Open Standards prevent the

hiding of information. This hiding can be intentional or not, but it will occur when proprietary formats are used. Software developed and sold by corporations will inherently create proprietary formats that attempt to make it cheapest to keep buying that company's software. The only approach to avoiding this is to, by policy, prevent use of proprietary standards and insist on the use of Open Standards for both information and documents.

Wyley Robinson
wyley@netscape.net
17 High Street
Andover, MA

From: Sommer, Meryl (MRC) [Meryl.Sommer@state.ma.us]

Sent: Friday, September 09, 2005 11:56 AM

To: 'Standards@state.ma.us'

Cc: McNeil, Neil (MRC)

Subject: Linux

Dear Mr. Quinn:

I am a licensed vocational rehabilitation counselor working at the Massachusetts Rehabilitation Commission. It has come to my attention that the Commonwealth of Massachusetts is considering changing the computer operating system used by state employees to LINUX. It is also my understanding that this operating system is not compatible with SCREEN READERS.

It is essential that any changes to the computer operating system be compatible with screen readers in order to be accessible to vision impaired consumers and employees of the Commonwealth, and to be in compliance with the Americans with Disabilities Act.

Sincerely,

*Meryl Sommer, MS, CRC, LRC
Sr. Vocational Rehabilitation Counselor
Massachusetts Rehabilitation Commission
275 Hancock Street
North Quincy, MA 02171*

From: Ward Vandewege [ward@earthling.be]
Sent: Friday, September 09, 2005 11:36 AM

To: Standards (ITD)
Cc: campaigns@fsf.org
Subject: comment about open standards for office documents

Dear Madam, dear Sir,

I was very pleased to learn that Massachusetts is pushing ahead with its commitment to open standards for office documents.

As an MA resident, I look forward for the day that all public government documents are made available in the OpenDocument format.

As an indepent software developer I can only applaud this move because it means a levelling of the playing field. It also provides guaranteed access to the information in the documents for many years to come, without having to worry about compatibility issues or being forced to use certain expensive proprietary software packages.

Keep up the good work!!

Sincerely,
Ward Vandewege.

From: Paul Smith [psmith@nortel.com] on behalf of paul@paulandlesley.org
Sent: Friday, September 09, 2005 11:51 AM
To: Standards (ITD)
Subject: Open Formats standards

I was gratified to read the proposed revised version of the Data Formats section of our Enterprise Technical Reference Model. I urge the government to ratify this proposal as-is.

The OASIS standards are, by all accounts, technically solid. Moreover, they provide a fully unencumbered format in which to undertake the State's business. No citizen of the Commonwealth can be allowed to be beholden to the largess of a particular proprietary corporation in order to participate in the democracy.

And finally, using an open standard guarantees that our posterity is preserved in formats which we can continue to parse many years into the future, long after our current suite of software offerings has been declared obsolete.

Thank you for your time and efforts on our behalf!

Paul D. Smith
153 Shade St.

Lexington, MA 02421
USA

**Comments of the
Software & Information Industry Association (SIIA)**

**On the
Enterprise Technical Reference Model v.3.5 (Public Review Draft)**

September 9, 2005

On behalf of the members of the Software & Information Industry Association (SIIA), we appreciate the opportunity to comment on the Enterprise Technical Reference Model v.3.5 (Public Review Draft) (“ETRM”).

As the principal trade association of the software code and information content industry, the more than 700 members of SIIA develop and market software and electronic content for business, education, consumers and the Internet. SIIA’s members are software companies, ebusinesses, and information service companies, as well as many electronic commerce companies. Our membership consists of some of the largest and oldest technology enterprises in the world, as well as many smaller and newer companies. Several of SIIA’s leading members were actively involved in working with the Information Technology Division (ITD) of the Commonwealth of Massachusetts in developing this draft policy.

The draft policy correctly lays out the principle that a “process-independent, enterprise view of government information enables data sharing where appropriate within the bounds of security and privacy considerations ... Better data interoperability and management will foster better IT [information technology] governance, while also improving the quality and accessibility of information and services.” Through the use of open XML standards, the ETRM seeks to enable interoperable services that can be reused across the enterprise, as well as with external business partners and governments where appropriate.

SIIA commends the ITD for recognizing, in addition to XML, that “other acceptable formats technology” (i.e., “de facto” formats and specifications for the presentation of data, text, etc.) that meet the criteria of openness (even if not affirmed by a traditional standards body) are considered acceptable under the policy for use with official records of the Commonwealth.

As we understand the draft policy released last week, there are other related policies and associated disciplines – i.e., Enterprise Information Classification Policy and Records Management, respectively – that remain to be determined. SIIA looks forward to working with the ITD as the collateral policies and disciplines are prepared for further consideration.

Please do not hesitate to contact us if you have additional questions: Mark Bohannon, General Counsel & SVP Public Policy at 202-789-4471 or David Leduc, Director of Public Policy at 202-789-4443.

Mr. Peter Quinn
Chief Information Officer
Commonwealth of Massachusetts
One Ashburton Place, Room 1601
Boston, MA 02108

Via e-mail to: standards@state.ma.us

Dear Mr. Quinn,

I write in response to your Enterprise Information Technology Architecture Public Review Draft dated August 29, 2005. My concern is for the effect this change will have on state and local agencies as well as the technology sector. Many state and local agencies have existing licenses for Microsoft Office and the conversion could cause unnecessary difficulty in daily office function. As a legislator my office depends upon its ability to share documents smoothly with many different sources.

I am also apprehensive about potential costs to the state in order to comply with this document format proposal. This may have the possibility of creating an unforeseen financial burden for the Commonwealth as it will increase IT costs through training, licenses, additional products and programs. Agencies may experience a less than smooth transition that could directly impact on our citizens as well as those we share information with in order to conduct business.

In closing I respectfully request that the proposal put forth be reconsidered and an adequate evaluation of the outcome be closely examined.

Thank you for your attention to this matter. If I can be of further assistance, please do not hesitate to contact me at (617)722-2263.

Sincerely,

Brian S. Dempsey
State Representative
Third Essex District

From: Jim Prendergast [jimprendergast@techleadership.org]

Sent: Friday, September 09, 2005 1:29 PM

To: Standards (ITD)

Cc: Travaglini, Robert (SEN); Pacheco, Marc (SEN); Wilkerson, Dianne (SEN); Hart, John (DOC); Berry, Frederick (SEN); DiMasi, Salvatore - Rep. (HOU); Dempsey, Brian - Rep. (HOU); Bosley, Daniel - Rep. (HOU)

Subject: Comments re: Enterprise Technical Reference Model v.3.5



On behalf of the 40,000 members and technology consumers of Americans for Technology Leadership (ATL), I am writing to inform you of our opposition to the proposed Mandate of Open Office and Portable Document Format (PDF) formats as contained in Enterprise Technical Reference Model v.3.5. While we support and agree with your goal of interoperability through the use of XML, this proposed policy as written tilts what is a vibrant and competitive marketplace towards a select minority of corporate competitors and ultimately places a tremendous burden on thousands of business and millions of consumers. In short, it is bad public policy and should not be implemented.

Consumers and the Commonwealth have been well served by a marketplace that encourages market competition and innovation. It is a system that allows software companies of all types, large and small, to offer their services to the Commonwealth, regardless on how they license their products. Unfortunately, this proposed mandate directs state business towards specific vendors at tremendous cost and inconvenience while doing little to benefit the Commonwealth or consumers.

The proposed mandate states "The specification (OpenDocument) was recently approved by OASIS as an open standard." Just because something is deemed an open standard, does not automatically imply that the format is the best suited for implementation. By limiting the state to one format you will miss out on future innovations that companies may make in other document formats. The policies outlined in Enterprise Technical Reference Model v.3.5 will freeze the Commonwealth in a state of technology developed a few years ago, missing out on future innovations.

I, as I'm sure are others, am interested in the transition costs you estimate for this new mandate. Not only will there be significant financial outlays, but tremendous inconvenience to your constituents. Surely there will be significant costs to the Commonwealth as you transition systems to only work in the mandated document formats. Consider what the Gartner Group just published about the adoption of Linux on the Desktop. Gartner claims the operating system is reaching the point where the costs of migration may exceed the cost benefits in a phase characterized by over-enthusiasm and unrealistic projections which lead to more failures than successes.

Has any consideration be given to the disruption that will also be forced onto business and citizens who also interact with the Commonwealth? Law firms who file electronically, businesses that regularly interact with agencies via electronic files, even citizens who would want to take advantage of online services offered will potentially have to reconfigure their own computer system to also comply with this mandate. Those costs would be tremendous.

One common theme between the two differing formats mandates is that the software needed to view and in the case of Open Office, create, is freely downloadable. Some open systems and specifications are less

costly to acquire, develop and maintain, but this is not a universal thought among industry analysts. As you are well aware from experience in the software industry, teaching an old dog new tricks takes time and money. These retraining costs when switching systems should and need to be considered when calculating the transition to this new mandate. In fact some studies have shown that "free" solutions can be more costly than proprietary systems because of this retraining. This should be a concern of taxpayers.

In addition, there is an inherent contradiction in your mandate that is difficult to interpret. While mandating that documents be created in the OpenDocument formats, you also state that PDF is another acceptable format. As you mention, this format was developed and is administered by Adobe Systems. While widely used in both commercial and consumer circles, it is not an open format as you describe in the mandate for OpenDocument. If the state is concerned with ensuring openness in archiving, why is there an exception for this proprietary format?

Existing document formats and future innovation from companies like Microsoft, Corel and Apple will be off limits to procurement officers in the Commonwealth. This includes open source products as well as proprietary products. Upon examination, the Enterprise Technical Reference Model v.3.5 seems more like an effort to direct state business to one or two select vendors under the guise of open formats, rather than a true effort at interoperability. This approach will cost consumers and small business untold hours of frustration, confusion and compliance.

While the goal of the Enterprise Technical Reference Model v.3.5 is laudable, the path to which it takes the Commonwealth is the wrong one. Mandating the use of these two formats clearly benefits select IT vendors at the expense of the citizens of the Commonwealth.

Jim Prendergast
Executive Director
Americans for Technology Leadership
www.techleadership.org

Ps. As you are well aware, many people are following this debate online. Below is a piece from David Coursey published by eWeek (a Massachusetts based publication) that analyzes this technology mandate. Thought you'd be interested his observations.

Massachusetts Fights a Losing Battle
September 6, 2005
By David Coursey

<http://www.eweek.com/article2/0,1895,1855876,00.asp>

[The decision by the People's Republic of Massachusetts](#) to require an "open" format for the storage of state documents is a curious one. It seems to be as much about punishing Microsoft as it is the laudable goal of making information more accessible. Microsoft should accede to the state's demand that it open its file formats, not because Massachusetts is demanding it, but because there isn't a good reason not to. Effective Jan. 1, 2007, Massachusetts CIO Peter Quinn has designated two acceptable formats for documents created by state workers: The OpenDocument format used by the OpenOffice 2.0 suite and Adobe Acrobat's PDF format. As PDF is primarily a read-only format, most day-to-day storage would presumably be in OpenDocument. Under Quinn's order, Microsoft formats, though supported by free readers as well as competitive applications like WordPerfect and OpenOffice are not considered "open" and cannot be used by the state's workers after the 2007 deadline. Some observers see this as a move by the state toward adoption of OpenOffice as the its standard desktop productivity suite, though it also appears that if Microsoft were to add the ability to read/write the OpenDocument format to Microsoft Office that it could remain on state desktops. Microsoft could also, of

course, open its existing file formats for use by everyone.

As for the punishment angle, you'll remember that the Bay State was among those that along with the federal government sued the software giant; a battle that ended with barely a slap on Microsoft's wrist.

Massachusetts is also the home, even the birthplace, of the free software movement, which Quinn's anti-Microsoft rule would certainly help.

For the purpose of this discussion, let's suppose Mr. Quinn can actually enforce the edict he's set forth. I wouldn't take odds on that, but for now I'm willing to give the guy benefit of some considerable doubt.

Part of the reason for this is that most businesses, including the state of Massachusetts, already have a set of file formats that work just fine and provide a migration path as technology changes. These are the Microsoft formats, which may not be open but are so widely used that it's been many years since I've run into someone who had trouble opening a Microsoft document.

And if WordPerfect and OpenOffice will also open Microsoft files, you can't say the formats are closed very tightly. I'd make the case that Microsoft formats are "open enough" for government work. Or anybody else's. Mr. Quinn, of course, would disagree.

I find it hard to imagine that a set of files written in OpenDocument today will be as easy to open in 20 years as files written in Microsoft data formats. I'd be surprised if there were an OpenDocument format in two decades, unless it gains Microsoft's support.

To that end, I agree with Mr. Quinn that Microsoft should open its formats and, if possible, add OpenDocument to the formats it supports. I've previously suggested that Microsoft Office should learn to read and write PDF files, which Mr. Quinn also accepts as being "open."

I am concerned that by requiring OpenDocument that Mr. Quinn may be aligning Massachusetts with what becomes a second-rate file format as Microsoft keeps expanding into XML and metadata and OpenDocument may have trouble keeping up.

It would be a shame to have Windows Vista on your desktop but be unable to use metadata searches because your application and/or file format doesn't support it. That could easily happen if Microsoft doesn't make OpenDocument a first-class format of its own.

I have seen comments that Mr. Quinn is really trying to move Massachusetts toward Linux, OpenOffice and other free software. If that's the case, I wish he'd come out and say so, rather than give Microsoft such an easy way to avoid the bullet as adding OpenDocument to its set of file types.

I would find it much easier, in fact, to make the case that Massachusetts should make a complete change in Office suites, from Microsoft to OpenOffice, than to get behind merely requiring an "open" file format.

But, given the likely user opposition—most people actually like Microsoft Office—I can imagine why Mr. Quinn isn't taking on this battle. Perhaps demanding a new file format and hoping Microsoft doesn't respond by adding it, is all Mr. Quinn thought he could accomplish toward a larger goal. If Microsoft doesn't respond, Mr. Quinn could perhaps justify changing the office suite on state desktops. My bet, however, is upset state agencies and users would block such a move and derail both Mr. Quinn's plans and career.

Yes, Microsoft should open its file formats, which no longer provide the company with a significant competitive weapon. But if Redmond doesn't step up, Mr. Quinn would be a fool not to back down.

Contributing editor David Coursey has spent two decades writing about hardware, software and communications for business customers. He can be reached at david_coursey@ziffdavis.com.

From: Andy Szybalski [andys@cs.stanford.edu]
Sent: Friday, September 09, 2005 1:35 PM
To: Standards (ITD)
Subject: Open software formats

Dear sir or madam,

I'd like to commend Massachusetts for their wise decision to require open formats for all documents. Endorsing and fostering stronger open document formats is a bold move that will help Massachusetts adapt to whatever changes may occur in the technology landscape. With organizations like the US Copyright Office <<http://www.copyright.gov/fedreg/2005/70fr44878.html>> making shortsighted decisions to tie their content to proprietary technologies like Internet Explorer, it's great to see that someone is getting it right.

I urge you to stand your ground, despite bullying from companies like Microsoft who have a vested interest in discouraging openness and interoperability.

Andy Szybalski
Mountain View, CA

From: Bob Halloran [rkhalloran@gmail.com]
Sent: Friday, September 09, 2005 1:36 PM
To: Standards (ITD)
Subject: Support for open standards

I think the most telling case for open standards is the current problem at the FEMA website for people registering for help after the Katrina disaster (www.fema.gov/register.shtm). You have to have Internet Explorer 6.0 or later, under Windows, to apply online.

A news story at the MSNBC website (www.msnbc.nbc.com/id/9231271) talks about a man who got his 90-year-old mother out of Mississippi to California and went to register her for assistance at FEMA, only to be thwarted because he uses a Macintosh. While I understand that IE is a lion's share of the market, building the site to be hospitable to other browsers should not have taken that much additional work. Not doing so is slowing people getting help.

Having been born in Boston, I applaud your efforts to make public documents usable without requiring proprietary formats. I'm sure there will be PR repercussions for your decision, and heavy lobbying by certain software companies to backtrack. I urge you to stand firm in the best interests of your citizens and hopefully set an example for other public entities. Thank you.

--

Bob Halloran
Jacksonville FL

Statement of Tom Giovanetti
President,
Institute for Policy Innovation (IPI)

Submitted to Peter Quinn
Chief Information Officer,
Commonwealth of Massachusetts

Regarding ETRM v.3.5 Public Review and Data Formats

Mr. Quinn,

Please accept this submission for your comment period ending Sept. 9

After a review of the proposed Massachusetts Open Formats standards, I'm forced to conclude that the recommendations have gone beyond what is best for the residents of the Commonwealth of Massachusetts, and far beyond what is necessary to ensure interoperability, and both forward and backward compatibility.

The right policy to be pursued is the policy that is best for residents of the Commonwealth. My assumption is that Commonwealth residents would appreciate a solution that allows maximum compatibility and interoperability, while keeping costs as low as possible and the process as efficient as possible. It seems to me that the proposed regulation does not accomplish these goals.

I should also point out that the logic and arguments in my comments apply to any agencies that might be using either Corel proprietary software, such as their office suite, or IBM (Lotus) proprietary software, such as Lotus Notes, Domino, or WordPro. My comments are not necessarily only applicable to Microsoft products.

I would like to make the following comments:

1. First, perhaps the most egregious element of the proposed policy is that it not only specifies that a software product must support a particular open format, but insists that this format must be the *default format* in a particular company's products.

This insistence goes far beyond ensuring that Massachusetts agencies have the benefits of interoperability and standardization, and seems to be an attempt both to undermine a particular proprietary format, and also seems to be *an attempt by a government to dictate the default format for the entire marketplace*. If these are the goals of the policy, they go far beyond the policy considerations that have been articulated by the Commonwealth.

2. It strikes me that there is an enormous unnecessary cost to the Commonwealth if this policy is implemented, and I find no evidence from your website that any estimate has been performed as to the cost of this policy to the public or to state agencies.

The Commonwealth has already made an enormous investment in software licenses, and this investment will be wasted under this policy.

While industries have certainly found that there are certain software applications where open sourced or non-proprietary solutions can be economically justified, [a recent Gartner Group report](http://mediaproducts.gartner.com/gc/webletter/microsoft4_enterprise/2005/article14/article14.html) finds that there is no defensible return on investment (ROI) from switching from Microsoft office products to StarOffice or other open source options:
http://mediaproducts.gartner.com/gc/webletter/microsoft4_enterprise/2005/article14/article14.html

It would be interesting to know if the Commonwealth has conducted its own study that disagrees with this Gartner Group study.

3. The proposed standard fails to take into account the almost certain massive number of pre-existing documents, for which backward compatibility would seem to be a key “interoperability” issue.

This policy will require an enormous amount of document conversion, and this document conversion is necessary ONLY because of the exclusion of certain commonly-used standards already in use by the Commonwealth.

4. A move to XML as a standard for interoperability is an excellent idea. However, limiting the document formats to the OpenOffice format is unnecessary, and gives preferential treatment to specific vendors and vendor types, and prohibits others. The proposed policy thus goes beyond what is necessary for convenience, interoperability, and forward-thinking, and crosses over into a philosophical attack on proprietary models of software innovation.

The evidence suggests that proprietary software companies are moving quickly to support XML standards. In fact, my recollection is that Corel has been a leader in the implementation of XML as a standard, going back to their Ventura Publisher product, which was among the first major applications to move to a native XML environment. Microsoft has also eagerly embraced XML, and the history of your discussions with Microsoft shows that Microsoft has worked with Massachusetts to reach a satisfactory arrangement.

- a. It is ironic that the EU, which is engaged in a major antitrust action against Microsoft, has ENDORSED Microsoft’s approach to open licensing of the XML format. Yet while even the EU finds that Microsoft’s approach to open licensing of the XML standard is acceptable, the proposed policy of the Commonwealth of Massachusetts does not.
 - b. It is also my understanding that discussions earlier in 2005 between Mass. CIO Kriss and Microsoft resulted in an agreement that the Open Format standard would include some Microsoft proprietary formats, and thus that these formats would be “deemed to be Open Formats because they will no longer have restrictions on their use.” The new proposed policy seems to ignore that understanding.
5. The proposed policy ignores the beneficial partnerships that could (and do) exist between government information offices and proprietary software companies. In fact, by standardizing on the proposed policy, Massachusetts users will be deprived of new innovations and features that will undoubtedly appear because of the innovative leadership of proprietary software development.

Ask yourself: which model of innovation first comes up with a bit of functionality, the “open” model or the proprietary model? Almost always, it is a proprietary company that introduces a new innovation, and then the “open” solutions try to find another way of delivering the same functionality. Why not work with those innovative companies, rather than ruling them out? There is no other conclusion from the proposed policy than that it is designed for the purpose of excluding proprietary products and formats.

6. Finally, the way the new policy has been developed is suspect. It is clear from documents on your own website that the CIO’s office publicly supported Microsoft’s approach with regard to its Office XML schemas by signing an agreement with Microsoft to include the open royalty-free licensing for Office formats within the Commonwealth’s policy.

Now, the Commonwealth is proposing a policy that is at odds not only with its investment in existing licenses, but also at odds with its previous agreement with Microsoft. Shouldn’t such a dramatic reversal, without comment or economic justification, be explained?

Frankly, after studying the way the proposed policy has been crafted, and especially the way it has developed even after reaching agreements with Microsoft, the only reasonable conclusion is that the policy is being driven by an animosity against a particular company, or at least a philosophical attempt to strike a blow at the proprietary software development model and to favor alternative software development models. Is this the proper role for government? Is this what represents the best value for residents of the Commonwealth?

I appreciate this opportunity to offer comment on the proposed policy, and I hope such public comments will be taken seriously. I’m convinced that if the Commonwealth implements this policy, history will demonstrate that it was a costly mistake.

Thomas A. Giovanetti
President,
Institute for Policy Innovation
www.ipi.org

From: Jim DeLong [jdelong@pff.org]
Sent: Friday, September 09, 2005 1:45 PM
To: Standards (ITD)
Subject: RE: Information Domain -- Enterprise Technical Reference Model v. 3.5
TO: INFORMATION TECHNOLOGY DIVISION
EXECUTIVE OFFICE FOR ADMINISTRATION AND FINANCE
COMMONWEALTH OF MASSACHUSETTS
DATE: SEPT. 9, 2005
FROM: THE PROGRESS & FREEDOM FOUNDATION

This is in response to your request for comments on Enterprise Technical Reference Model v. 3.5

The Progress & Freedom Foundation is a market-oriented think tank that studies the digital revolution and its implications for public policy. Its underlying philosophy combines an appreciation for the positive impacts of technology with a classically conservative view of the proper role of government.

We believe that the technological change embodied in the digital revolution has created tremendous opportunities for enhanced individual liberty, as well as wealth creation and higher living standards. Those opportunities can only be realized if governments resist the temptation to regulate, tax and control. Government has important roles to play in society, including protecting property rights and individual liberties, but its tendency is to reach beyond its legitimate functions in ways that harm consumers, burden citizens and slow progress.

In this spirit, I object to the proposal contained in Enterprise Technical Reference Model v. 3.5 to make OASIS Open Document Format the standard for use by all state agencies. In support of this view, we would associate ourselves with the comment recently submitted to you by the Association for Competitive Technology.

In addition, I would like to point out that the Commonwealth is hardly unique in its interest in promoting openness and interoperability, but that regulatory mandates are not an efficient way to foster these values. Very creative things are occurring in the private sector, and will continue unless they are short-circuited by government action. I urge you to examine my recent paper published by PFF: "[Reflections on Intellectual Property and Standards - The Immediate Issue: Should Standards be Own-Able?](#)" *Progress on Point 12.14* (The Progress & Freedom Foundation, August 2005). This paper examines the complex standard-setting processes in the private sector, and concludes that issues of openness and interoperability are indeed being addressed in creative and productive ways.

For example, there is indeed a strong drive toward the promotion of document interoperability based on adoption of the XML standard, a development that is being supported by numerous participants in the market. But the issues are complex, and are undergoing a process of continuing sifting by those with an interest in the issues. The Massachusetts proposal will truncate this process in a manner that will have undetermined costs and consequences, and will create problems for state agencies, private sector businesses and individuals that have not been adequately identified or evaluated.

In addition, and as a caution against the tendency to jump to a conclusion that non-ownership somehow promotes technological progress, I urge you to read an article in the latest *Forbes* (Sept. 19, 2005) entitled "The Taming of the Screw." It describes how "a product development director at Illinois Tool Works, the nation's biggest screwmaker, . . . has reinvented what the company dubs the threaded fastener in a way that lets it grip tight where it used to let loose--and compete with cheaper screws made by offshore rivals."

The ultimate savings to industries and consumers all over the world from this reinvention of the humble screw will ultimately be in the billions of dollars, but the process was neither obvious nor simple, and it safe to say that the innovation would not have come about absent the potential for profit created by the patent system. These new screws will not be "open" in the sense of being freely copyable, but they are certainly "open" in the sense that ITW will make them widely available at reasonable cost.

Similarly, in the context of software, openness is not incompatible with proprietary software, and we urge the Commonwealth to keep these distinctions at the forefront, and not to impose expensive and burdensome mandates in the name of some academic concept based on a rejection of the profit motive that is in fact the driving engine of economic progress.

Sincerely yours,
James V. DeLong
Senior Fellow & Director -- IPCentral.Info

Progress & Freedom Foundation
1444 Eye St., NW -- Suite 500
Washington, DC 20005
202-969-2944 Direct
202-289-8928 Main
202-302-5827 Cell
jdelong@pff.org
www.IPcentral.Info
www.pff.org

From: Melanie Wyne [MWyne@comptia.org]
Sent: Friday, September 09, 2005 2:20 PM
To: Standards (ITD)
The Information Technology Division
The Executive Office for Administration and Finance
The Commonwealth of Massachusetts

Via email: standards@state.ma.us

To the Information Technology Division:

The Initiative for Software Choice (ISC, www.softwarechoice.org) – a global coalition with over 300 members is pleased to respond to your request for comments on the Information Technology Department's (ITD) Information Domain – Enterprise Technical Reference Model v. 3.5. We are most immediately concerned that the mandated use of the OASIS Open Document Format for all Commonwealth agencies creates an unnecessary, costly and harmful open source software mandate in Massachusetts. We hope that our comments will be useful and that this document will serve as the beginning of a constructive dialogue that will result in an enterprise IT policy that truly benefits all the citizens of the Commonwealth.

We are troubled by the sudden announcement of this policy coupled with a short time frame to receive public comment. This policy change was announced on the eve of the Labor Day holiday on August 29. The public was then given two weeks to provide comments. We urge the Commonwealth to put this significant change in IT policy on hold until a more thorough public debate can be had, and the state can fully consider the wide-ranging cost and efficiency implications that this change will likely impose on Massachusetts' workers, IT industry and citizens.

The ISC strongly supports the development and adoption of all kinds of software: be it open source software (OSS), hybrid or proprietary. For this reason, we believe that mandatory government

regulations, which prefer or mandate the use of specific kinds of software, weaken the overall marketplace by limiting competition and innovation.

ITD identifies accessibility of government records and interoperability of government data as the stated goals of this new policy. The new policy includes the adoption of XML data standards for all new development projects and the classification of metadata for future data collection. Finally the use of the Open Document Format is mandated for all Commonwealth agencies beginning on January 1, 2007.

This mandated use of Open Document formats practically results in a mandated transition to open source desktop software for all agencies in the Commonwealth.

ITD is to be commended for addressing the Massachusetts' need to improve the storage, archiving and management of public documents. However, while we applaud the goal of achieving data interoperability through the use of XML data standards, the ISC believes that the additional step of mandating a single document format goes too far. In our opinion, the mandated use of Open Document Formats creates an unfair procurement mandate for Open Document-compliant vendors to the detriment of all other competitors, including other OSS vendors that may not adhere to the preferred formatting requirements.

We believe that less costly, non-preferential policy options can achieve ITD's stated goals. The existing policy in Massachusetts, that this proposal would replace, encourages open data formats and is inclusive of all software licensing models that meet certain objective "openness" requirements and that are licensed on a royalty free basis. This current policy achieves a high-level of interoperability both within the Commonwealth, as well as with the wider public. However, the proposed policy change would reduce competition for state procurement thereby, potentially increasing cost, reducing future innovation and limiting the services available to Massachusetts' citizens.

Moreover, the current policy comports with the intellectual property policies of many leading global open standards organizations. For example, ANSI, ECMA, ETSI, IEEE, IETF, ISO/IEC and ITU all expressly acknowledge the right of intellectual property rights holders to place reasonable restrictions on the licensing of their essential technology covering an open standard. Excluding technical standards that include proprietary formats will only serve to limit the technical innovation available to the Commonwealth.

The new policy signals a shift in state procurement policy as represented by Secretary of Administration and Finance Eric Kriss in October, 2003. At that time, Secretary Kriss stated that with respect to IT procurement the Commonwealth intends "where possible, to evaluate open source software on a level playing field with proprietary software" and to "implement the most cost-effective solution that offers the best technology." We are aware of nothing that warrants a change from this balanced approach to state IT procurement.

Moreover, this policy signals a massive and expensive transition not only for state agencies but ostensibly, for all organizations, businesses and individuals who interact with the Commonwealth using

electronic documents. A migration of this scale on such a short time period will be both expensive and time consuming for the Commonwealth, not to mention the as yet unknown impact on the public

Has the Commonwealth fully considered the impact of this transition upon citizens and taxpayers who must interact with Massachusetts after this policy is implemented? What additional steps will be required of them? At what cost? It does not appear that this policy has considered the total cost of ownership, i.e. both the direct and indirect costs associated with such a significant transition. These costs include retraining, installation, consulting and service fees, which will be incurred by the Commonwealth. Unless these costs are explicitly factored in and compared across all software models, reasonable criteria for choosing next generation desktop software cannot be developed and applied. Under the proposed mandated OSS policy, this would be impossible.

The 300 plus members of the ISC urges Massachusetts to stop, rethink and reconsider this policy change. We stand ready to work with you to develop a realistic IT policy that benefits the Commonwealth's citizens, taxpayers and its industry.

Sincerely,

Melanie Wyne

Executive Director

Initiative for Software Choice

Cc: Peter Quinn

Sen. Marc Pacheco

Sen. John Hart

Rep. Daniel Bosley

From: Heather Johnson [heather@massnetcomms.org]

Sent: Friday, September 09, 2005 2:22 PM

To: Standards (ITD)

Cc: Quinn, Peter J. (ITD)

Subject: Re: Public Review Draft of the ETRM v3.5

Peter J. Quinn

ITD Director & Chief Information Officer Commonwealth of Massachusetts State House, Room 373
Boston, MA 02133

Re: Public Review Draft of the ETRM v3.5

Dear Mr. Quinn:

On behalf of the Massachusetts Network Communications Council and our members in the Commonwealth, I appreciate this opportunity to submit comments endorsing the Commonwealth's proposed adoption of the OASIS Open Document Format for Office Applications (OpenDocument 1.0).

We believe the OpenDocument standard promotes competition and offers the best means to achieve the Commonwealth's goal of ensuring long-lived, open, and shareable office documents. Because it is an open, XML-based standard, OpenDocument provides long-term preservation of data, which means users/citizens can access their information now, and decades from now, regardless of which product (be it open source or proprietary) they used to create it. XML is not by itself an open standard for document exchange; it deals purely with raw data, and requires a standard formatting schema on top of it, such as OpenDocument, to turn it into something useful that allows users to exchange compatible documents.

All vendors have as much access to the OpenDocument formats as anyone else. There is no software or vendor preference. Rather, it is an open standard, non-proprietary, and easily implemented format created through open participation in a widely-recognized and vendor-neutral forum. It is available to anyone on a royalty free basis, and does not have intellectual property encumbrances on that use. Vendors can compete aggressively, without software preference or lock-in, to the advantage of the Commonwealth's taxpayers and to the advantage of further software innovation.

Thank you for providing us with the opportunity share our views.

Sincerely,

Carol Meier
Executive Director
Massachusetts Network Communications Council



FREDERICK E. BERRY
MAJORITY LEADER

COMMONWEALTH OF MASSACHUSETTS
SENATE MAJORITY LEADER
STATE HOUSE, BOSTON 02133-1053

ROOM 333
TEL. (617) 722-1410

September 9, 2005

Mr. Peter Quinn
Chief Information Officer
Commonwealth of Massachusetts
One Ashburton Place, Room 1601
Boston, MA 02108

Dear Mr. Quinn:

I am writing with regard to my concerns over the Enterprise Information Technology Architecture Public Review Draft dated August 29, 2005. Of particular concern is the obvious lack of discussion and notice on this proposed major policy shift. I find it most troubling that such a drastic change to the Commonwealth's procurement policy would have a public comment period of a mere eleven days.

Furthermore, I have serious concerns about the cost of implementing such a proposal. As it stands presently, many state agencies have running licenses for the use of Microsoft Office. By disallowing the use of Microsoft Office in January 2007 these licenses would be unnecessarily wasted. Also of concern is the increase in IT costs that the Commonwealth will undoubtedly face from implementing this proposal. Still further, each state agency will need to invest in additional product licenses, support licenses, training and support activity in order to make this conversion.

I am also troubled by the question of software interoperability. I believe this proposal ignores the practical reality that millions of documents in existence are/were created in Microsoft Office. It is unclear to me as to whether even our own municipalities will be able to correspond with the state. Will our local governments be forced to buy new software and if so who will absorb that cost?

My colleagues and I in the State Senate have promoted and passed legislation to attract technology companies here to the Commonwealth. I believe that instituting a preferential procurement policy such as this would erase our years of hard work and benefit only a small group of companies with no significant local ties.

It is for all these reasons that I respectfully request that the Administration reconsider this proposal and open the process up to discussion. Please feel free to contact my office if you have any further questions and thank you in advance for your attention to this important matter.

Sincerely,

Frederick E. Berry
Majority Leader



*Robert W. Holleyman, II
President and Chief Executive Officer*

1150 18th Street, NW
Suite 700
Washington, DC 20036

p.202/872.5500
f.202/872.5501

September 9, 2005

Mr. Peter J. Quinn
ITD Director & Chief Information Officer
Commonwealth of Massachusetts
State House
Room 373
Boston, MA 02133

Dear Mr. Quinn:

Thank you for the opportunity to comment on the Commonwealth's draft Enterprise Information Technology Architecture and, specifically, the proposal to move state agencies to an open format document standard.

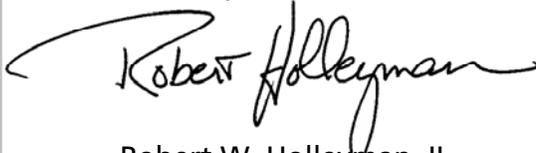
BSA* member companies are the leading American developers of hardware, software and Internet technologies, and the cutting-edge products they develop constitute some of the most popular and effective means by which governments exchange, preserve, and archive public documents. Indeed, the research and development undertaken by many of our member companies in this field can be of immense value to the Commonwealth's own discussions in this area, and we hope that their views and experience will be an important part of the public discussion and record.

BSA strongly supports the objective of expanding data interoperability, maintenance and storage both within and among public entities. Indeed, the need to enhance governmental communications and maximize long-term access to public records is one that is at the forefront of public policy discussions not just in Massachusetts, but across the United States and internationally.

BSA has played an active role in these discussions both domestically and overseas. Specifically, we have emphasized the importance of voluntary, industry-led standards as a means of advancing the objectives of public administrations. We have encouraged public-private partnerships aimed at developing practical and workable solutions to addressing the challenges of public administrations. And we have emphasized the importance of ensuring that such solutions do not inadvertently discourage the development of new and innovative technologies.

We are very interested in participating in similar discussions with you and your Department as this initiative moves forward, and look forward to such interaction in the weeks and months ahead.

Sincerely,

A handwritten signature in black ink that reads "Robert Holleyman". The signature is written in a cursive style with a large, sweeping initial "R" that extends to the left.

Robert W. Holleyman, II
President and CEO

Enc.: BSA Principles of Software Innovation

**The Business Software Alliance (www.bsa.org) is the foremost organization dedicated to promoting a safe and legal digital world. BSA is the voice of the world's commercial software industry and its hardware partners before governments and in the international marketplace. Its members represent one of the fastest growing industries in the world. BSA programs foster technology innovation through education and policy initiatives that promote copyright protection, cyber security, trade and e-commerce. BSA members include Adobe, Apple, Autodesk, Avid, Bentley Systems, Borland, Cadence Design Systems, Cisco Systems, CNC Software/Mastercam, Dell, Entrust, HP, IBM, Intel, Internet Security Systems, Macromedia, McAfee, Microsoft, PTC, RSA Security, SAP, SolidWorks, Sybase, Symantec, The MathWorks, UGS.*

Principles for Software Innovation

Software innovation is a driving force for economic, social, and technological progress. Allowing multiple software development business and licensing models to compete on their merits is the best way to promote software innovation, and ensure that customers – both private and public – have a range of choices in their software procurement decisions. Much of the driving force for software comes from commercial development by independent software companies. Recently, some companies and individuals have chosen a “community” based development model, by making their code voluntarily available to all developers, to encourage their contributions. Each of these models forms a part of a healthy, diverse software marketplace.

The continued vitality of all software development models depends on the merits of their respective products, and not the method of development chosen. Lately, concerns have emerged that policy makers, through government procurement policies, or research funding, may seek to favor one software development model over another. With respect to the method of development, we believe, quality, functionality, reliability and value, not preconceptions about development methods, can best promote continued innovation and progress. With respect to intellectual property, we believe the terms under which software is licensed should be a matter for the right’s holder to decide. In all cases, software acquisition choices should be determined by the marketplace.

To ensure innovation and improvements in software development, the following Principles for Software Innovation should be embraced:

- 1. Governments should select software on its merits, not simply the model of its development.** All software products offer varying benefits and costs. Public entities should procure the software that best meets their needs -- based on functionality, performance, security, value, and cost of ownership -- and should avoid any categorical preferences for open source software, commercial software, free software, or other software development models. Governments that attempt to identify one software development model as superior in terms of a particular variable, risk making incorrect choices among the full range of software products available in the marketplace.
- 2. Ensure that government funded research is available to all.** Government plays an important role in financing basic software research. When public funds are used to support software research and development, such funding should be made equally available to all developers, regardless of the development model chosen to do the research. The innovations that result from this work should be licensed in ways that take into account both the desirability of building a commons of knowledge and the desirability of applying basic research advances to commercialized products. The dissemination of results broadly in this manner has contributed to a virtuous cycle of innovation in which government funding for basic research advances the set of knowledge available to the public by spurring advances in commercial products. These commercial products in turn generate growth and tax revenue necessary to fund future rounds of public research.
- 3. Promote neutral standards.** Voluntary, industry-led standard setting is the most effective way to develop neutral and market-based standards. When these standards are open and available to all through licensing they help developers to create products that can interoperate with each other. Governmental policy on software standards should not

discriminate in favor of, or against, any particular software development model. It is important that government policy recognize that open standards – which are available to any software developers – are not synonymous with, and do not require, open source software either for their adoption or utility.

4. Maintain strong intellectual property protection consistent with the principles of neutrality. Policymakers should not make specific intellectual property licensing choices a precondition for eligibility for procurement, nor should they discriminate between developers that chose to license their intellectual property on commercial terms, and developers that chose not to charge licensing fees. Commercial and community-based software developers should remain free to elect to seek compensation for their exercise of intellectual property rights, or to refrain from charging fees. This decision should remain, as it has been traditionally, a matter for the right holder's informed choice.



September 9, 2005

Peter J. Quinn
Chief Information Officer
Commonwealth of Massachusetts
Information Technology Division
One Ashburton Place
Boston, MA 02109

Subject: ITD Open Source Policy

Dear Mr. Quinn:

On behalf of the Massachusetts District Attorneys Association, we urge ITD to reconsider the proposed open source/open format policy.

This new policy, as outlined in your documents of August 24, essentially requires all Commonwealth agencies to terminate their relationship with Microsoft within 18 months and move to an open source platform, yet it does not provide direction, plans or funding for what must replace Microsoft. This letter will summarize our main concerns and we will provide detailed back-up documentation in due course if that would be helpful to your process.

Intellectually, there can be no argument with trying to eliminate artificial limits on what we can do in the technology area and we certainly work to reduce our costs by introducing competition.

While the current thrust of ITD's proposed policy deals with open format for documents, this approach ultimately leads one to consider the use of open source applications for the "office" environment. While this may be a good long term vision, MDAA believes that practical considerations lead to the conclusion that setting a near-term deadline for such an implementation is premature.

1. Today's Open Standards Might Not Guarantee Future Readability.

This new policy may not further ITD's stated goal of creating electronic documents using open standards such as XML to preserve data "accessibility over very long periods of time". There is no guarantee that the software tools used to edit and read such data will be available in the long term. On the contrary, the short history of computing has demonstrated that physical formats of storage will rapidly become obsolete and inaccessible. Information stored on optical media such as CD-ROM or DVD may soon become as impractical to read as 8-inch floppy drives, paper tape or punch cards. Even if machines which can read these media are preserved, the media themselves have a

limited life. According to an article published by the University of Massachusetts, [<http://www.caps-project.org/cache/DigitalMediaLifeExpectancyAndCare.html>] magnetic media have a shelf life of only a few years, and optical media only a few decades. Truly preserving data for long periods of time can only be achieved by putting it into the form of acid-free paper, microfilm or stone tablets!

2. Most documents will not need to be preserved for long periods of time.

The Commonwealth's Public Records law requires agencies to create destruction schedules for documents. Most documents are not kept for very many years. This process is overseen by the Secretary of the Commonwealth. Furthermore, records which are kept over ten years may not be in electronic format:

[Excerpt from "A Guide to the Massachusetts Public Records Law"
<http://www.sec.state.ma.us/pre/prepdf/guide.pdf>]

Electronic Records Storage

At the time of this writing, the Commonwealth has not adopted formal standards for the storage, retrieval and maintenance of long-term electronic records. Therefore, no agency or municipality is permitted to store records with a retention period of more than ten (10) years exclusively electronically. All paper originals must be maintained pursuant to the applicable retention period for that document.

Records with a retention period of less than ten (10) years may be stored exclusively electronically once the agency's computer storage system has been approved by the Supervisor of Records and the proper Destruction Schedules have been submitted and approved.

The Supervisor of Records and the Public Records Division is working diligently to format electronic storage standards. Once these standards are adopted, all agencies and municipalities will be permitted to request approval of their storage systems. Once a system has been reviewed and approved, proper Destruction Schedules may be submitted. If you have any questions regarding electronic records and storage, please do not hesitate to contact the Division or the Records Management Unit.

3. Current Formats are Reasonably Accessible.

Microsoft Word and Corel WordPerfect each have built-in conversion utilities to and from each other, html, rich text format (rtf) and plain ASCII text. Microsoft offers viewer programs that can open and read documents for Word, Excel and PowerPoint free of charge. Office 2003 can save documents in a modified version of XML. Microsoft has made its XML schema freely available.

Open Office also has a similar functionality. See the FAQ from the OpenOffice web site concerning sharing OpenOffice documents with office users:
<http://software.newsforge.com/software/05/07/21/1834257.shtml?tid=152&tid=93>

Sun Microsystems has announced that it intends to build filters between some of the Office 2003 XML Reference Schemas and StarOffice/OpenOffice.

4. Microsoft Office is Moving to XML format.

Microsoft Office is the primary tool used to create documents and spreadsheets in most state offices. Realizing that the industry is moving towards XML-formatted documents, Microsoft has announced that the next version of Office will use the XML format as the default format. [See <http://www.microsoft.com/presspass/features/2005/jun05/06-01XMLFileFormat.mspx>]

5. There is Currently No Reasonable Alternative to Common Office Application Suites.

This issue is perhaps of the greatest immediate concern to the District Attorneys. Microsoft Word and Corel WordPerfect have achieved popular use because they are easy to install and use. They also offer useful features such as spell check, embedding of graphics and sounds, the ability to create easily charts and tables, headers and footers, embedding of page enumeration, management of rich formatting and outlining as well as integration with other office suite applications such as e-mail.

The main advantage to using Microsoft products in an office environment is that, in large measure, these products provide very reliable interoperability and rich functionality. Since most of our users are not IT experts, such interoperability and functionality are critical to the day to day operation of our offices. To our knowledge, there is no current, large scale demonstration of open source applications that could be used as a model for our planning. We are unaware of any organizations with which we exchange documents that use products such as OpenOffice or StarOffice.

A consistent set of tools allows the Commonwealth more easily to recruit staff that will be proficient with minimal training. There are more than 400,000,000 Microsoft Office users worldwide. Have there been any studies on the amount of training necessary for MS Office user to get back to the same level of competency?

OpenOffice is both an open source¹ and open standard² application does not include a database or project application. These can be purchased as open standard but not open source. Switching would again most likely tie us to the same type of large company as Microsoft, e.g. Sun or IBM both for software and support.

6. Migrating from Office to Another Standard May Be Costly.

Are the tools for automated installations available and on par with current standard tools? A quick search on the internet for automated installation of MS Office retrieves many relevant documents. The same search for OpenOffice yielded very little relevant information.

7. Successful Testing Should Precede Any Implementation Plan.

It is best practice in any application and environmental migration to proceed in phases that include at least a proof of concept and Beta and regression testing prior to full scale

¹ A licensing model and a development model that allows coordinated development and free licensing.

² A collection of specifications and reference models that can be applied to interfaces and technologies that allow hardware and software to interoperate and communicate and exchange data.

implementation. It would be extremely risky and costly to have each agency go through these processes individually. In the end, MDAA believes some form of interoperability management will be required. Should agencies choose such an interoperability manager (or should many such managers be chosen) not only would the anticipated cost savings never materialize, but costs could actually increase when a reduction in user productivity is included.

We should learn from past mistakes: in the rush to convert programs to html from client server many applications lost functionality. We would not like to see the same mistake made to get documents into XML format which give the end user no benefit.

Sun and IBM have incentives to add value to their StarOffice and IBM Workplace suites to entice customers to choose their product and support. This may lead us to support OpenOffice, StarOffice and IBM Workplace all at the same time. As version upgrades are add to this, it could lead to a very confusing support problem.

If such proof of concept and Beta test data exists, we would willingly participate in reviewing the results. As we have stated in prior discussions of this subject, the best methodology to follow if we are determined to use open source applications is for ITD or some central group to provide the systems engineering and release management for the Commonwealth. There are many reasons for recommending such an approach, however, the main reason is because the real costs associated with using Microsoft (or any formal vendor) relates to the pace at which new versions are rolled out, the pricing schemes employed and the support time line for prior versions of software.

Should we simply be able to manage the version release processes, we would avoid much of the current costs we would all like to eliminate.

8. Conclusion.

MDAA urges that no date be required for implementation of this policy and that significantly more effort be apparent in the areas of release and implementation management.

Sincerely Yours,

Geline W. Williams
Executive Director

Ronald A. Calabria
Director of Information Technology

CC: The Massachusetts District Attorneys

From: Menard, Joan (SEN) [Joan.Menard@state.ma.us]

Sent: Friday, September 09, 2005 3:33 PM

To: Standards (ITD)

Subject: Enterprise Information Technology

Mr. Peter Quinn

Chief Information Officer

Commonwealth of Massachusetts

One Ashburton Place, Room 1601

Boston, MA 02108

Dear Mr. Quinn:

I am writing in response to your Enterprise Information Technology Architecture Public Review Draft dated August 29, 2005. Of particular concern is the lack of adequate notice and opportunity for stakeholders to be heard on this drastic change in procurement policy.

In addition, the proposed document format mandate creates an unfair and unnecessary state procurement preference. The proposed policy allows only certain products to be used. The proposed policy ignores the practical reality that there are millions of documents in existence in Microsoft Office and other formats. It also gives an unfair advantage to Adobe PDF, and that is not justified. This proposed policy simply promotes the use of a narrow group of obscure and unproven software products for viewing and storing documents.

I am also very concerned about the costs for the state to comply with this document format proposal. This proposal has the very real possibility of having negative consequences for the Commonwealth as it will unnecessarily increase IT costs. Many state agencies already have licenses for Microsoft Office which would be wasted by disallowing use of Microsoft Office in January 2007. Further, every state agency will face enormous document and/or application conversion efforts, in order to move to a less functional product.

Still further, each state agency will need to invest in additional product licenses, support licenses, training, and support activity in order to make this conversion. Every agency will uniquely need to assess their situation, plan the projects, determine the costs, find the funding, cut out other projects, or otherwise deal with the additional costs. On a continuing daily basis, state agencies will then need to work with the private sector organizations and citizens on a case-by-case basis to work out ways to convert documents back and forth and to troubleshoot problems. One can only wonder how this would affect critical agencies like those within the Executive Office of Human Services who depend on the interoperability of their respective IT systems with other branches of state government, particularly the judicial and public safety sectors.

Another real concern regarding interoperability is the affect on municipalities. Will they have to buy new software to in order to correspond with the state under this new scheme? Will those costs be considered an unfunded mandate under our local mandates law?

Finally, this policy will hurt the tech sector in the Commonwealth, particularly local software companies. As a legislator, I have worked with my colleagues over the past several years to make Massachusetts a place where tech companies want locate and grow. Why now does this Administration want to create a preferential procurement policy that benefits only a handful of companies yet penalizes businesses with a significant local presence?

It is my hope that you will reconsider this policy and open up the process so that other public officials, citizens, municipalities and other stakeholders have adequate time to understand and be heard on this

major policy shift.

Sincerely,

Joan M. Menard
Senate Majority Whip
1st Bristol & Plymouth

From: Grant, Mary - Rep. (HOU) [Mary.Grant@state.ma.us]
Sent: Friday, September 09, 2005 3:37 PM
To: Standards (ITD)
Subject: Enterprise Information Technology Architecture

Dear Mr. Quinn,

I am writing regarding your proposed policy for the procurement of certain document formats for the Commonwealth. While I do support the move to more open document formats, I believe it is not in our best interest at this time to limit the options to exclude the system we have just invested millions of dollars in. I understand there was an inclusion of our current system in the list of possibilities up until the past few weeks when you removed the option for our current system.

Here is my rationale:

1-The purpose of purchasing any system is ease and efficiency of communication. We have just begun to adjust and make use of the product we have now purchased. Given it is a lifetime purchase with service and updates included, a move to exclude their option for the open document format is limiting the effectiveness of our own system.

2-Systems outside of ours are much wider users of this system at the current time and it is more effective to use our dollars to a broader purpose.

3- What we have is newly purchased and it is an unnecessary cost at this time when resources are so scarce to create a demand for dollars for a possibly less effective item and at least not more effective.

4-The industry recommendations, which are more objective, do not support this idea, so why would we close off our options as we move into the future?

In closing, our current system, which is newly acquired in many areas of state government, can be considered a much more efficacious purchase for many years to come if we leave ourselves the option of including its open document format as a procurement option. Inclusion on our list is a much more effective use of our taxpayer dollars, rather than limiting the list to options built on a single base that is not compatible with what we currently own and have just been trained in using for millions of dollars.

In addition, I believe the limiting nature and the cost of a policy proposal of this magnitude needs more attention and input than two weeks notice as summer is finishing. I believe there is a commission set up to review major changes in technology that must also review a proposal.

Thank you for your consideration of my input.

Sincerely,

Mary E. Grant
State Representative

M A S S A C H U S E T T S
HIGHTECHNOLOGYCOUNCIL

Dedicated to Growth... Committed to Action

September 9, 2005

Mr. Peter J. Quinn
ITD Director & Chief Information Officer
Commonwealth of Massachusetts
State House, Room 373
Boston, MA 02133

Dear Mr. Quinn:

In a state with an economy built on technological advancement, the Commonwealth needs to set a high standard of Information Technology practices and e-government innovation. The primary goals of the state's IT procurement regulations should be to provide easy and secure access to state services and information that is of value to residents and businesses of Massachusetts.

In this vein the Council would like to express its support for the Commonwealth's proposal to adopt the OASIS Open Document Format for Office Applications as the state standard for office documents. This is the direction the industry is taking in general and makes perfect sense for the complex and unique IT needs of a public entity like the Commonwealth. The standard would allow a broader audience to access public documents for longer periods of time and is consistent with the goals of open standards in preserving choice and interoperability in software applications.

In addition, the Council has called for open standards and interoperability in eHealth and eGovernment. Our support for the Commonwealth's proposed regulations is a logical extension of that view. We are also confident that you have structured the standards in a way that promotes competition among software vendors.

Overall, the Public Review Draft of the ETRM v3.5 outlines the best course for the public interest, innovation economy and taxpayers of Massachusetts.

Sincerely,



Christopher R. Anderson
President

From: Brian Charlson [brian.charlson@carroll.org]
Sent: Friday, September 09, 2005 3:16 PM
To: Standards (ITD)
Subject: Open Source and blind and visually impaired persons

My name is Brian Charlson and I am the Vice President, Computer Training Services at the Carroll Center for the Blind in Newton Massachusetts. Our not-for-profit agency is the primary contractor providing computer instruction for clients of the Massachusetts Commission for the Blind. It is our understanding that the Commonwealth of Massachusetts, through your office, is considering changing from the Microsoft Windows and Microsoft Office standard to an open source model. We, at the Carroll Center, are very much aposed to making this kind of change without first confirming that the new platform and all applications being run on it are demonstrated to be accessible to those who are blind or visually impaired. We have heard that you have indicated to others who have expressed their concerns, that you will be looking into this matter. It has been our experience that any effort to look at accessibility after a product has been adopted, results in failure and the displacement of those who require adaptive technology to do their jobs.

We highly recommend that you and your organization reconsider your recommendation to move to an open source model. If there are compelling reasons why Massachusetts must make the change, we ask that the needs of the population we serve is considered to be a make or brake issue. It is our belief that making such a swich without first guarantying the accessibility for each and every product will result in loss of jobs, marginalizing those with disabilities and placing Massachusetts in a position where it is likely to be sewed under the Americans with Disabilities Act, Section 508 and 504 of the U.S.

Rehabilitation Act and Section 255 of the U.S.

Telecommunications act.

Twice today I have tried to reach you by phone only to find my call passed over to your administrative assistant who was not there to answer either. I would ask that you reply to this email message and call me at your earliest convenience. My work number is (617) 969-6200 Extension 224. A live conversation might be able to overcome my concerns and give me information that I might pass on to others who are calling me as they are calling you asking why the needs of blind and visually impaired people, the ADA, Rehab.

Act and Telecommunications Act are being ignored. Please call soon!

P.S.

I know that the tone of this message has been strident. For that I apologies. If this were the first time I and those I serve have been threatened by technological change without first assuring its accessibility, I doubt that I would be in such a state of distrust, but it is not! Please make that call.

Brian Charlson
Vice President, Computer Training Services Carroll Center for the Blind 770 Centre St.
Newton, MA 02458
www.carroll.org



Re: Open Source Standards Considerations

To: Peter Quinn, Chief Information Officer, Commonwealth of Massachusetts
From: Ann Rettie, Managing Partner, Accenture Revenue and Customs Industry
Date: September 9th, 2005
Re: Open Source Standards Considerations

The Commonwealth's vision for cross agency collaboration, application interoperability and data exchange can lead to powerful results. Accenture commends and supports the Commonwealth's strategic planning of technology investments using a high-level vision of data commonality and best-practice reuse across departments. This viewpoint, represented in the recently published "Information Domain - Enterprise Technical Reference Model v3.5", sets the standard for document and content management across the Commonwealth. Following are some Accenture comments and observations we hope you find helpful as you finalize this standard.

In following the Commonwealth's new policy on open standards and open source, IT stakeholders will need to make product selection decisions using a guide for product evaluation. Aspects of an open source product that should be evaluated include:

- Technical viability and maturity - has the product been proven in production under conditions similar to the Commonwealth's anticipated use?
- Safety - will the Open Source component operate without adverse impact on the agency's infrastructure?
- Supportability - will the product have sustainable supportability from a developer community?
- Intellectual Property - are there adverse licensing implications?
- Total Cost of Ownership (TCO) - have aspects of additional support costs that normally do not come included with the source code been considered?
- Functionality - does the product provide the required functionality?
- Enterprise fit - does the product integrate with enterprise applications?
- Quality - is the product quality fit for purpose?
- Longevity and current activity level - have the longevity and stability of the software been considered?

Accenture supports the use of an open source product if it has reached a maturity level sufficient for the proposed use. Other considerations around Open Source solutions include the following:

- Open Source software products should be selected and used in the same way as any other proprietary software. Modification of the source code is not recommended.
- Access to Open Source frameworks and libraries should be structured and controlled to maintain the integrity and quality of software products.
- For complex business or functional applications, Open Source solutions are often not suitable due to lack of maturity.
- Perceived Total Cost of Ownership reduction should not be used as the single determining factor for using Open Source products, since often the Actual Total Cost of Ownership includes product support and ease of implementation, which is highly dependent on maturity level and other previously listed evaluation aspects.

Accenture appreciates the opportunity to provide this input to the Commonwealth. The above information represents only a summary of key considerations for Open Source Standards. If you would like any additional information, please do not hesitate to contact me at 703-947-3522 or c.ann.rettie@accenture.com or Bill Kilmartin at 617-454-4785 or william.kilmartin@accenture.com.



September 9, 2005

By Email:

Standards@state.ma.us

The Information Technology Division
The Executive Office for Administration and Finance
The Commonwealth of Massachusetts

To the Information Technology Division:

As the CEO of Systems Engineering, Inc. (SEI), a Waltham-based technology services company, I am writing to comment on the "Information Domain – Enterprise Technical Reference Model v3.5." I am confident that this policy will unnecessarily complicate the hard work of many of the Commonwealth's agencies and technology providers, as well as possibly increase costs for taxpayers unnecessarily.

Each system development project, in our experience, has a different set of calculations as to how the desired result can most quickly, effectively, and less expensively be delivered.

Given that Office document types are so widely used, the prohibition of their use in systems design would on occasion produce a situation where the result would be less effective, more expensive to build and maintain, and much more complex to implement. Especially for those systems in which individuals and businesses external to the Commonwealth need to submit documents to the Commonwealth for use in Commonwealth systems, such as service delivery reports, invoices, required reports on compliance, licensure documentation, and the like, requiring only Open Document formats would force those vendors or individuals to change the document creation capabilities they probably already own.

From a software development consulting firm's perspective, which is completely devoted to trying to serve our customers' best interests, I would encourage the Commonwealth to not restrict the document standard to only the Open Document standard, but to allow each project's economic dynamics to define the most appropriate document standard.

I agree completely that standards reduce the inefficiencies in system communication and laud the effort to reduce complexity in the types of technologies that the Commonwealth must manage. I would encourage the Commonwealth to allow such a pervasive standard as basic document standards to be aligned with the marketplace, though. While Open

Document standard may become pervasive, and its recent growth is impressive, it seems early to use to make it the only acceptable standard available to system designers and those doing business with the Commonwealth as citizens or businesses that interact with the various state programs.

As a system designer and developer, we're happy to comply with any standard that the Commonwealth sets, and will do so with enthusiasm. Our reason for commenting on this issue is born out of our conservative view of major changes that might have unforeseen consequences. I would encourage the Commonwealth to also be conservative in adopting a more narrow standard than the marketplace in general does. As a taxpayer, I'd like to be sure that the costs of conversion, replacement of existing products, training of new users, and satisfaction among citizens and businesses that interact with the state are all accounted for before such a major change is mandated.

Sincerely,

Alan Day, CEO
Systems Engineering, Inc
657 Main Street
Waltham, MA 02451

781-736-9100 x215

From: Stephen Samuel [samuel@bcgreen.com]
Sent: Friday, September 09, 2005 4:17 PM
To: Standards (ITD)
Subject: A philosophical Thought.

A young acolyte once went to the head monk to ask a question:

- * What is the difference between knowledge and faith?
- * Knowledge is like the Sun. Faith is like a candle.
- * How so? Shouldn't faith be like the blinding light of the sun compared to the knowledge as the bare light of the candle?
The abbot paused for a minute.
- * Come ask me the question again at midnight.

I think that the same could be said of Linux vs Microsoft. The point being that we, the users control Open Source software. It won't go AWOL when we need it most -- which can happen with proprietary software.

Microsoft, like the sun will do precisely what it wants.

MS's authentication rules for XP mean that it's entirely possible that we'll be unable to load their software onto a computer 10 years from now if we **need** it to open some proprietary file format that only runs on XP. At that point it doesn't matter **how** big Microsoft is. You're toast.

As long as the user has control of what software can read their data, there will always be a (legal) way of doing so. Depending on someone else to 'play nice' -- especially When they've got a history of not doing so is dangerous. The world did that in the 1930's and it took a long, bloody war to correct that mistake.

--

Stephen Samuel +1(604)876-0426 samuel@bcgreen.com
<http://www.bcgreen.com/~samuel/>

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Senator Jack Hart
First Suffolk District
The State House, Room 520
Boston, MA 02133-1053
(617) 722-1150, (617) 722-2191 (fax)

September 9, 2005

Mr. Peter Quinn
Chief Information Officer
Commonwealth of Massachusetts
One Ashburton Place, Room 1601

Boston, MA 02108

Via e-mail to: standards@state.ma.us

Dear Mr. Quinn:

I write in response to your Enterprise Information Technology Architecture Public Review Draft dated August 29, 2005. Of particular concern is the lack of adequate notice and opportunity for stakeholders to be heard on this drastic change in procurement policy. The fact that this "policy" document was published on the ITD website on August 29 with a public comment period deadline of September 9 is troubling and does not appear to be in compliance with well established administrative and procurement laws of the Commonwealth.

In addition the proposed document format mandate creates an unfair and unnecessary state procurement preference. The proposed policy allows only certain products to be used. The proposed policy ignores the practical reality that there are millions of documents in existence in Microsoft Office and other formats. It also gives an unfair advantage to Adobe PDF that is not justified. This proposed policy simply promotes the use of a narrow group of obscure and unproven software products for viewing and storing documents.

I am also very concerned about the costs for the state to comply with this document format proposal. This proposal has the very real possibility of being a financial boondoggle for the Commonwealth as it will unnecessarily increase IT costs. Many state agencies already have licenses for Microsoft Office which would be wasted by disallowing use of Microsoft Office in January 2007. Further, every state agency will face enormous document and/or application conversion efforts, in order to move to a less functional product.

Still further, each state agency will need to invest in additional product licenses, support licenses, training, and support activity in order to make this conversion. Every agency will uniquely need to assess their situation, plan the projects, determine the costs, find the funding, cut out other projects, or otherwise deal with the additional costs. On a continuing daily basis, state agencies will then need to work with the private sector organizations and citizens on a case-by-case basis to work out ways to convert documents back and forth and to troubleshoot problems. One can only wonder how this would affect critical agencies like those within the Executive Office of Human Services who depend on the interoperability of their respective IT systems with other branches of state government, particularly the judicial and public safety sectors.

Another real concern regarding interoperability is the affect on municipalities. Will they have to buy new software to in order to correspond with the state under this new scheme? Will those costs be considered an unfunded mandate under our local mandates law?

Finally, this policy will hurt the tech sector in the Commonwealth, particularly local software companies. As a legislator, I have worked with my colleagues over the past several years to make Massachusetts a place where tech companies want to locate and grow. Why now does this Administration want to create a preferential procurement policy that benefits only a handful of companies yet penalizes businesses with a significant local presence? Given that no other state in the nation is entertaining adopting anything close to this draconian IT procurement policy I would like to know what the real impetus for this decision is and why it is being fast-tracked.

It is my hope that you will reconsider this ill-advised policy and open up the process so that other public officials, citizens, municipalities and other stakeholders have adequate time to understand and be heard on this major policy shift.

Sincerely,

Jack Hart
STATE SENATOR

From: Rlee@asap.com
Sent: Friday, September 09, 2005 4:43 PM
To: Standards (ITD)
Cc: Pacheco, Marc (SEN); Hart, John (DOC); Wilkerson, Dianne (SEN); DiMasi, Salvatore - Rep. (HOU); Bosley, Daniel - Rep. (HOU); MacEvitt, Marge (OSD)
Subject: Open Standards, Open Source

Thank you for the opportunity to respond to the Commonwealth's proposal for movement toward an "open document" format.

ASAP has been the COTS software provider for the Commonwealth of Massachusetts for some time, and our current contract has potential extension for several more years. I mention this at the beginning to simply let you know of our position with the Commonwealth as an IT supplier, and to preface my remarks with the understanding that we have always kept the Commonwealth's interests in mind as we have supplied software and related items to not only the Commonwealth, but also to the local governments and academic institutions. I also state this to let you know that our comments can be somewhat objective - as the contract holder, we could benefit by the Commonwealth replacing its entire Microsoft desktop. But even though we have a corporate mandate to remain profitable, we understand that to a greater degree, we have to provide not only products, but a high level of service and advice that comes from our particular area of expertise.

We understand that software not only has to be easy to license and use, but that it also has to provide significant return on investment for it to be a good deal for everybody concerned. Over the years we have given advice to our customers both to "upgrade to a new version" and also to "stay with the current version they're using." Based on our experience and expertise, we sit down with customers to understand their long-term goals, directives, technology platforms as well as their current needs and current standards. Based on this and other pertinent information, we reach decisions on not only *what* software to purchase, but also the *best way* to purchase that specific software - or as the case may be, not to purchase anything. If a customer isn't using the features of a given upgrade, or can't understand or even implement the benefits of the new version, it's probably not a wise decision to make a move to something different. Its never a "one-size-fits-all scenario." And I suppose that is one of the more surprising things in the above referenced proposal.

Given the time-frame stated in the proposed policy, agencies would have to switch methodologies, training, archives, etc., starting immediately. In a time when budgets are tight, employees are highly leveraged, and the use of technology is at an all-time high, one might question such dramatic changes in direction in the stated short period of time. The Commonwealth has invested greatly in Microsoft

technology over the years, both at the Operating System level, but also at the Desktop and Server level. We have to assume that this investment was because Microsoft was the only product on the market. Other products have been available - not only proprietary, but also using various open standards. Customers seem to have made decisions that were based on long-term technology and total workability in the environment - total cost of ownership, or return on investment.

We applaud the desire to move toward interoperability using an XML standard. Certainly being able to share data in a common format has its benefits. Given the practical reality of millions of existing documents, the challenges of improving productivity and efficiency, and the public accountability in the future, ASAP will be ready and available to help the Commonwealth agencies and organizations ensure that interoperability goals are met with the Microsoft products in place, or other existing products.

We believe that the proposed policy would create significant costs and problems for both the Commonwealth and its citizens that may not have been fully considered and evaluated. Given that many agencies are already licensed for Microsoft Office on their desktop, and the expense has already been borne by the Commonwealth and its citizens, these licenses would be wasted by disallowing their use after 2007 - thus destroying the ROI that was originally considered by the agencies. As mentioned earlier, the agencies will have to consider enormous document/application conversion costs, additional training costs, support costs (even though it should be "open standards," support is still required) - as well as the cost to purchase the new "open source" products.

With regards to public documents, there are undoubtedly millions of documents held by state agencies that are not currently in the open document or Adobe PDF format that will need to be converted for future reference without jeopardizing their integrity. It seems that the Open Document format was not developed to provide 100% backward compatibility from other "non-open document" file formats. It is quite possible that agencies and its citizens could incur practical problems (which may include additional costs) routinely as they will have the need to work with archived materials of all types.

We would encourage the Commonwealth to thoroughly consider the significant investment that has already been made with respect to other technologies, including Microsoft. It is quite possible that there are less costly, less limiting options that achieve the desired goal of interoperability.

We value our relationship with the Commonwealth, and we look forward to working with you in the years to come. We would be happy to sit down with you and discuss these matters further.

Sincerely,

Randy Lee
VP Government, North America
ASAP Software
850 Asbury Drive
Buffalo Grove, Illinois 60089
Phone: 847-465-3700 x5900
Fax: 847-465-3277
rlee@asap.com

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September 9, 2005

Mr. Peter Quinn
ITD Director and Chief Information Officer
Commonwealth of Massachusetts
Room 3730
State House
Boston, MA 02133

Dear Mr. Quinn,

I write to you regarding the proposed Information Domain – Enterprise Technical Reference Model v.3.5 (“ETRM”) which was introduced on August 29, 2005 by the Information Technology Division (ITD).

The Committee on Senate Post Audit and Oversight is continuing to review the ITD proposal to convert Executive Department agencies to an Open Document Format standard. The Committee has taken testimony on the earlier versions of ETRM and conducted a public hearing in December 2003.

ETRM would make Massachusetts the first state in the country to adopt an Open Source and Open Standards procurement mandate for its agencies. While your office has advised the Committee that this technology may ultimately lead to new efficiencies and improved performance for the Massachusetts information technology infrastructure, the state will be exposed to financial risk with this nascent technology. Therefore, the Committee remains concerned about the process in which ITD developed ETRM. Specifically, the Committee continues to have questions about the cost and procurement authority for this proposal as outlined below:

- 1) **Cost to the Taxpayers.** The Committee expressed concern in the December 2003 public hearing that the Total Cost of Ownership of the proposal had not been evaluated and transmitted to the Legislature. If there are costs associated with converting the Executive Department agencies to an Open Document Format in 2007, which ETRM describes as an effort of considerable magnitude, there is no funding provided in the IT Bond Bill and legislative appropriation would be required in the Fiscal Year 2007 budget. It is incumbent upon legislators to understand costs and potential financial risks prior to implementation of major and unproven policy initiatives.
- 2) **Process and Authority:** In section 390 of chapter 149 of the Acts of 2004, the Legislature created an IT Advisory Board with the mandate to “advise the executive department’s chief information officer on information technology issues, including the development of an enterprise vision, strategy and direction for the use of information technology in the executive department.” The Committee has questions about ITD’s collaboration with the advisory board in developing ETRM.

While iterations of this policy have been in existence for approximately two years, ETRM v.3.5 contains a recent policy change and the Legislature still does not have a cost analysis of the proposal. To resolve the above mentioned outstanding questions regarding ETRM, as the Chairman of the Committee on Senate Post Audit and Oversight I recommend the following:

1. ITD extend the public comment period until further evaluation can be done by the Committee on the proposed standards.
2. ITD provide cost analysis on this proposal, including training, customization, consulting and other costs associated with the migration.
3. A review of the cost analysis by the information technology specialists within the Office of the Massachusetts State Auditor, to determine the financial impact associated with the proposed standards.

I intend to conduct a public hearing on this matter prior to the end of the September and will request your presence to review the ETRM proposal. My office will contact you shortly to discuss this matter.

Sincerely,

Marc R. Pacheco
Chairman,
Senate Committee on Post Audit & Oversight

From: Thierry Stœhr [contact@formats-ouverts.org]
Sent: Friday, September 09, 2005 5:26 PM
To: Standards (ITD)
Subject: About open standards decision

Hello,

I just want to congratulate the State of Massachussets for its decision to use only real open standards.

I hope this will be an example for other states in the USA but as well in other countries, such mine in Europe, France.

So I'm a french citizen, involved in promotting open standards by writing every day an article about interoperability and open formats and protocols on <http://www.formats-ouverts.org>.

Of course, this decision, and the former episodes (in January, in March) have been developped on my Web site, first by traducing Mr Kriss' declaration (in January) in French (I was in email contact with him at that time).

- French translation in January :
<http://formats-ouverts.org/blog/2005/01/21/255>

- The last news in french :
<http://formats-ouverts.org/blog/2005/09/02/520>

and
<http://linuxfr.org/2005/09/05/19531.html>

Sincerely and open-standard-ly yours,

--

Thierry Stœhr, <http://www.formats-ouverts.org>

From: Rusty Carruth [rusty_carruth@credence.com]
Sent: Friday, September 09, 2005 5:53 PM
To: Standards (ITD)
Subject: comments on the 'Information Domain - Enterprise Technical Reference Model v3.5'

Please do not cave in to short-minded people who would give up freedom for ease.

In other words, please do not allow proprietary formats to be used for archival storage of government documents, thus assuring future readability of those documents.

(This also means that DRM must not be allowed to touch said archival documents!)

Thank you.

PS - there is a small error on my page 14, under the Office Applications/OpenDocument heading, Migration subheading, first paragraph that says, in part:
"may continue to use the office applications the have currently licensed." - that second 'the' should be 'they'.

rc

From: Richard Carriere [Richard.Carriere@corel.com]
Sent: Friday, September 09, 2005 6:04 PM
To: Standards (ITD)
Subject: Open Standards

Dear Mr. Quinn,

On behalf of Corel, office productivity software provider to some 20 million WordPerfect Office customers worldwide, it is my pleasure to respond to your request for feedback on the Data Formats section of Massachusetts' recently announced Enterprise Technical Reference Model.

WordPerfect Office is the leading alternative to Microsoft Office, and the only non-Microsoft office suite to retain a significant number of users within government organizations globally.

Corel views Open Standards as a way for customers to maintain seamless and timeless access to their documents. Open Standards also free customers from the risk and costs related to reliance on a single

vendor. For these reasons, Corel strongly supports the broad adoption of the open standards Massachusetts has outlined, including XML, the OASIS Open Document Format and PDF.

WordPerfect Office is first and foremost a vehicle for document creation. As such, Corel sees a massive requirement for the adoption of open standards that will enable the sharing, reuse, storage and management of documents regardless of application or platform.

Corel is an original member of the OASIS Technical Committee on the Open Document Format, and Paul Langille, a senior Corel developer, is among the original four authors of the ODF specification.

Suffice to say, Corel remains committed to working alongside OASIS and other technology vendors to ensure the continued evolution of the ODF standard and the adoption of open standards industry-wide.

Corel encourages Massachusetts to maintain its leadership and innovation in the adoption of open standards, and we encourage the Commonwealth to continue the consultative process to ensure that end users and vendors alike can understand and contribute to these formats' adoption.

Thank you for the opportunity to provide feedback on this important development, and please do not hesitate to contact us if you feel we can provide additional support or expertise in the implementation of these new standards.

Yours sincerely,

Richard Carriere,

General Manager
Office Productivity
Corel Corporation

From: Marlboro

Sent: Saturday, September 10, 2005 4:44 PM

To: Standards

Subject: "Open Source"

The state of Massachusetts is currently considering a move to "open source" programming via an operating system known as "Linux".

I can not believe that the State of Massachusetts would consider using a software system that would not work for disabilities. I am sure that if this is done it would lead to a court case if people with visual disabilities could no longer do their jobs. The State should be the leader in industry making sure that everyone who is currently employed or future employees would be able to use the software.

Pat Winske, Chairperson of the Marlborough Commission on Disabilities

From: David Spector [david@springtimesoftware.com]

Sent: Sunday, September 11, 2005 6:37 PM

To: Standards (ITD)
Cc: jerry.berrier@townisp.com
Subject: Problem with moving to Linux

Peter Quinn:

I understand that you are considering moving the State to Linux-based computer systems.

Please note that such systems, unlike Windows-based systems, cannot readily be made accessible to blind and visually impaired people.

I urge you to consult experts in the field of computer accessibility for blind and visually impaired people before you make this disturbing change within the Commonwealth system.

David Spector
Webmaster,
Massachusetts Alliance of Visually Impaired Students

From: Patrick Gannon [mailto:patrick.gannon@oasis-open.org]
Sent: Monday, September 12, 2005 9:42 AM
To: andrew.updegrove@gesmer.com; 'Quinn, Peter J (ITD)'
Cc: 'Carol Geyer'
Subject: Introductions: Updegrove - Quinn

Dear Peter,

We at OASIS were very pleased to hear of your decision to endorse the use of the OpenDocument Format OASIS Standard by the Commonwealth of Massachusetts.

At OASIS, we have completed our process of submitting the OpenDocument OASIS Standard to the ISO/IEC Joint Technical Committee (JTC1) for further international de jure standardization under the ISO/IEC rules. In addition, we will be highlighting the OpenDocument standard during our OASIS European Adoption Forum in London on 17-18 October. We are expecting continued interest and support from the European Commission.

http://www.oasis-open.org/events/adoption_forum_2005/

Please let me know if there are any other local or national events where you feel a presentation on the OpenDocument OASIS Standard would be appropriate and of interest to other US state governments.

As a way of introduction, I would like to introduce you to Andy Updegrove, Attorney at Law in Boston and Editor of the Consortium Standards Bulletin.

<http://www.consortiuminfo.org/>

Andy would like to interview you as part of a featured article he is doing on the OpenDocument OASIS Standard, as part of the edition focused on government adoption of open source software and open standards.

Warmest regards,

Patrick Gannon
President & CEO
OASIS
630 Boston Road
Billerica, MA 01821
+1.978.667.5115 x201 - office
+1.978.761.3546 - mobile
www.oasis-open.org

From: Gerstung, Stephen (RGT)
Sent: Monday, September 12, 2005 10:20 AM
To: Quinn, Peter J. (ITD)
Subject: support for open source/open format policy

My Quinn,

I am writing briefly to express my wholehearted support for your open source/open format policy, as outlined in your documents of August 24th. I agree that this policy is in the best interest of the taxpayers of the Commonwealth of Massachusetts, and I hope you will stand firm in maintaining this policy.

With Best Regards,

Steve Gerstung

Director of Information Services

Massachusetts Board of Higher Education

(617) 994-6995 Chelsea

(617) 889-6416 Chelsea fax

(617) 994-6940 Boston

(617) 727-0955 Boston fax

From: Michael Samett [efrumilshin@earthlink.net]
Sent: Monday, September 12, 2005 9:03 PM
To: Standards (ITD)
Subject: Open Source

Bravo to you for your desire to go open source! I am a resident of the Commonwealth and a public school technology teacher in it. If you move to open source, it will set an example for school districts here and around the nation. Schools are buried in software costs. Open source software like OpenOffice holds the promise of great cost savings and superb technical support from a myriad of knowledgeable, helpful people around the world.

Thanks again.

Michael Samett

From: Framingham
Sent: Tuesday, September 13, 2005 10:11 AM
To: Standards (ITD)
Subject: Blind and visually Impaired access to state computer and websites

Dear Mr. Quinn,,

It has come to my attention that you are in the process of switching vendors for delivery of I.T. services to a vendor that does not provide computer access to persons blind and visually impaired working for the commonwealth of Massachusetts. I urge you no to do this to stick with what you have. I am one of those state employees working for the commonwealth of Massachusetts. I am the Disability Services Coordinator at Framingham State College where I have worked for twenty-two years. I enjoy working both for the college and the commonwealth and I am honored to be a taxpaying contributor to the commonwealth as are other members of the blind community. I urge you not to do this and I thank you for your consideration of thus matter.

Sincerely Yours,
Dennis

From: Christopher Poe [cpoe@poeinfo.com]
Sent: Wednesday, September 14, 2005 2:44 PM
Cc: Standards (ITD); campaigns@fsf.org
Subject: Support of your Decision to Support the OASIS Electronic Document Format

To whom it may concern:

This is note from a citizen -- in Illinois -- in support of your decision to maintain electronic records and documents in the OASIS document format specifications.

Massachusetts' data is in fact its people's data. They have every right to expect that they can store it and retrieve it -- it's theirs.

A closed or proprietary storage format means that eventually Massachusetts taxpayers are going to have to pay someone for the right to get at their data. Most closed and proprietary license agreements exchange payment in exchange not for the software itself (and importantly, the source code that shows how it actually works), but for the right to USE the compiled software.

Let's say you pay supplier A for the right to use their software, and the data is stored in such a way that only supplier A's software can read that data. Supplier A now is in a very strong position. If you ever decide to move to another supplier (which could happen for a variety of reasons), you'd eventually like to migrate your data. You are forever locked into a relationship with Supplier A to get YOUR data.

The OASIS standard offers a way out. By choosing an open format, you're no longer tied into any particular software supplier. You now have the buying power to choose between literally the entire world of software suppliers. Literally the entire world knows the format, and can write software to read and write to it.

Open formats tend also to have higher quality. The entire world has the opportunity to peer review what's wrong with it. If you believe as I do that you never have perfection -- only continuous improvement -- then open standards and making problems visible greatly simplifies the improvement process.

We ask our corporations for transparent accounting records. We ask our governments for transparency as they act on our behalf. It's not much of a stretch to ask for transparency in the ways in which the people's data are stored and retrieved.

I hope you will accept one citizen's input. I look forward to the day when my home state of Illinois shows similar foresight as the Commonwealth of Massachusetts.

Respectfully,
Chris Poe
Island Lake, IL

From: Landry, Elizabeth (MRC) [Elizabeth.Landry@state.ma.us]

Sent: Wednesday, September 14, 2005 5:14 PM

To: 'Standards@state.ma.us'

Cc: Mahon-McCauley, Mary (MRC)

Subject: Dear Mr Quinn

Dear Mr. Quinn,

I just wanted to write you regarding my fear that you are considering changing the Operating System for the Commonwealth to Linux. It is my understanding that there are major concerns about this possible change, and the negative implications it could have for state employees with vision loss. There is a counselor in my MRC office who is blind, and she is an integral part of what makes our office so

successful in providing top-notch services to our clients. It would cause us all a great deal of consternation if such a vital employee was not able to do their job, due to technology which would impose barriers on them due to their disability. I know that is not your intention by considering Linux, but the implications for employees with disabilities would be huge. I am hopeful that you will be willing to work with state employees who could be affected by that change to find an accessible solution.

Thank you,

Elizabeth Rubin Landry CI,CT

MRC Quincy Staff Interpreter

From: Tom Wickline [twickline@gmail.com]
Sent: Wednesday, September 14, 2005 5:56 PM
To: ContactANF (ANF)
Subject: OpenDoc support

Hello,

My name is Thomas Wickline and im currently a resident of North Carolina and ive been reading about you future move to Open Document formats.

I just want to say even tho im not a resident of Massachusetts I want to send my full support to you on this matter. I can only hope that the government here in North Carolina is as insightful as you are.

Cheers,

Tom

From: Gloria Evans [agevans15@earthlink.net]
Sent: Wednesday, September 14, 2005 6:31 PM
To: Standards (ITD)
Cc: nfbmass@earthlink.net; agevans15@earthlink.net
Subject: Open Source Programming, an idea that will devastate the jobs and opportunities for the blind worker
Attention: Peter Quinn, Chief Information Officer

Dear Mr. Quinn,

There is afoot a plan to establish "open source programming" throughout the Commonwealth's computer system. Briefly, Sir, this idea is frankly discriminatory.

In general, Sir, whoever has designed, or is designing such a plan has no concept of the devastation its implementation will impose upon blind and severely visually-impaired employees of Massachusetts. Such a scheme could, indeed, expand to businesses that conduct computer contact with the Commonwealth as well.

Now retired, I worked for the Department of Veterans Affairs (VA) for nearly 33 years, most of which involved extensive and constant computer access by voice access. Following retirement from the VA, I worked part-time for the Massachusetts Commission for the Blind (MCB); as a Client Assistance Representative for nearly five years, voice access to my computer was crucial to the performance of my work.

In the age of technology, it is a virtual certainty that the blind man or woman seeking gainful, competitive employment MUST have open, equal access to whatever computer system a prospective employer utilizes.

Open source programming, as you intend will reduce, possibly negate this access, and we, the blind citizens of Massachusetts, vigorously oppose your intentions in this direction.

There will be a veritable flood of protest over this destructive move on your part, and it will come locally, nationally, and legislatively.

Instead, Mr. Quinn, please listen to the voices of the blind people who do not need another roadblock to equality and opportunity cast in our path.

With fervent hope that you will listen to the organized blind of Massachusetts, I remain

Yours most truly,

A. A. Evans, Member
Board of Directors
National Federation of the Blind of Massachusetts

From: John Mills [jmills117a@yahoo.co.uk]
Sent: Wednesday, September 14, 2005 6:46 PM
To: ContactANF (ANF)
Subject: Support for your states move to an open file format

Dear sir/madam ,

I am a citizen in the United Kingdom and would just like to state my admiration for the action that your government is taking by adopting an open standard document format for public records. This is clearly the correct move for the freedom of acquiring information for your citizens in the upcoming years to come. This is a bold and much needed measure and I commend you whole heartedly on this decision.

John Mills

From: Edward C. Howell [ed@panhandle.rr.com]
Sent: Wednesday, September 14, 2005 2:06 PM
To: ContactANF (ANF)
Subject: OpenDocuments

Hi, I just want to say I support you in your efforts to get open document standards for Massachusetts. It would be a better world if everyone would use the same format for written communication or all communications for that matter. If you prevail maybe others will follow including the federal government. I read that FEMA claims filed online can only be done with Internet Explorer. That leaves out about 10% of the people, the ones who run Mac, Linux and other operation systems. Government should not be that way. Oh by the way the open document format is more mature than the new office format which changes with each new release. Best Wished, Ed

From: Janez Podpecan [janez.podpecan@gmail.com]
Sent: Wednesday, September 14, 2005 8:30 PM
To: ContactANF (ANF); ITDWeb
Subject: Voice of support to the Massachusetts Information Technology Division

Hi,

Though I am from EU I would like to voice my full support for the report recommending that the state migrate to a new file format called OpenDocument.

I for one believe that OpenDocument standard would better enable state agencies to communicate with one another, share data, and preserve vital records as technology vendors change.

As everyone is free to provide filters to OpenDocument compliant format this increases freedom of choice of software vendor based on best value for the citizens of Massachusetts.

I believe that very shortly other vendors will provide OpenDocument compliant format along with today's OpenOffice.org, StarOffice, KOffice. Expect the competition to really heat up as Lotus, Wordperfect, Microsoft join the standardization effort using a common denominator for document format such as OpenDocument. Only government actions such as your fine example in the face of Microsoft's stranglehold on desktop can provide for standardization and forced openness.

Regards and best wishes to the policymakers that fight for freedom of choice and unencumbered future preservation of public records, Janez

p.s. Hope other states and countries worldwide (Norway is heading the same route) soon see the light of open standards.

From: mary and tom [duffy.lareau@verizon.net]
Sent: Thursday, September 15, 2005 5:28 AM
To: Standards (ITD)
Subject: Work for the whole Commonwealth peoples
Dear Mr. Quinn:

I strongly Oppose Open Source Programming

It is critical that the needs of blind users be taken into consideration before any major change is made, not after the fact.

Too many times we have been in situations where there were lots of good intentions but little action. All too often we hear words like, "We'll get this new system up and running, and then we'll fix any access issues that arise. Sir, that is a backward approach. It has not worked in the past, and it will not work this time. I want to send that message very loudly and clearly! To you and any others that need to know.

Mr. Quinn, I hope that our plight has been adequately heard by you and your office.

We're not necessarily against a change to a new system, we simply want to ensure that accessibility is built in from the ground up.

I know that you have heard from many members of the NFBM and many other blind and visually impaired persons on this subject.

Many years ago we in the NFB worked on a bill that would counter-act such a system change.

You and your Office have already made the Website for the Commission for the Blind unusable for blind and visually impaired persons, and any other people with less than perfect sight. As a matter of fact the whole website for Massachusetts is useless to most people wanting to know anything about our Commonwealth without a great deal of difficulty. So If this is an example of your great ability to serve the Commonwealth it will be a great loss of monies and time for the employees of Massachusetts, with or without a handicapped.

A handicapped person with a job is productive and not on the Welfare System.

Please make sure that the Open Source Programming is accessible for the blind and other handicapped persons.

I know that you have heard from our national office of the NFB and they have explained this whole situation very distinctly and very clearly to you and all your staff, so please listen and take heed.

Sincerely,

**Mary Ann Lareau, Secretary,
RC of Massachusetts Commission for the Blind
And a member of the National Federation of the Blind**

From: Aurelio Revetria [Aurelio.Revetria@bluarancio.com]

Sent: Thursday, September 15, 2005 8:28 AM
To: Standards (ITD)
Subject: My Best Compliments!

I think this is the right way toward digital democracy.
No one must be forced to buy a particular product in order to interact with public institutions!!!!
My hope is that also here in Italy government body follows your example.
(I know, my English is poor)

Bye!

--

Aurelio Revetria
Bluarancio Spa
Viale Masini 36
40126 Bologna (BO)
Tel. 051 2866613 Fax 0512866633
<http://www.bluarancio.com>

From: Nathan Marcus [mailto:latefreight@gmail.com]
Sent: Sunday, September 04, 2005 2:42 PM
To: ITDWeb
Subject: Excellent idea with Open Source file standards!

I am a citizen of Pennsylvania, a student, and a user of open source software. Although my sister does go to a fine college in Boston, so I feel I should pay attention to the Massachusetts government a bit. I applaud the decision to go to open file standards and don't back down to any company (likely Microsoft) to tell you there is anything wrong with your choice.

In fact, there may be more functionality than before!

-Nathan Marcus
Just south of Pittsburgh, Pa

From: fady@deligent.com [mailto:fady@deligent.com]
Sent: Saturday, September 03, 2005 5:24 PM
To: ITDWeb
Subject: Are you out of your mind?

Dear Mr. Quinn,

I read with interest your recent decision to switch MA government away from MS- Office.

Great - You want to switch the state from the most widely-used, most interchangeable file format into open standards? You're making it so no one within the state government can collaborate with anyone

outside it.

For what? To make a political point? To poke Microsoft in the eye?

Mr. Quinn, I have news for you. Computer users want monopolies. It makes life easier. I don't want 5 competing Operating Systems, I don't want my lawyer to use Wordperfect, and I don't want my accountant to use 123. I want a monopoly, it cheaper for me.

As a former CEO of MA-based company, I can safely say, if you were my CIO, I'd fire your ass.

Fady

From: Marco Casteleijn [mailto:marco.casteleijn@gmail.com]
Sent: Friday, September 02, 2005 1:20 AM
To: ITDWeb
Subject: Open source software Great move!

Dear Sir, Madam,

As a member of www.spreadfirefox.com, and an advocate of the use of open source software I would like to support your decision mad to use open software.

I however would not be spreading fire fox I would not point out the benefits of using Firefox (as a webbrowser) as can be read here

<http://lachy.id.au/dev/mozilla/firefox/campaign/5minute/challenge>

(takes 5 minutes to read), and the use of Thunderbird (for email)

<http://www.mozilla.org/products/thunderbird/>

We will follow your progress, and hope more states will follow.

With kind regards,

Marco Casteleijn (aka Up North)
SFX+ development team

From: Jim Carroll [info@TheComputerHut.com]
Sent: Thursday, September 15, 2005 11:30 AM
To: IT IT Procurement Official
Subject: The State of Massachusetts Open Document Mandate

Dear IT IT Procurement Official:

Your recent proposal to mandate an open-source-only data format (e.g., Open Document) for the Commonwealths needs is unnecessary, wasteful, costly, taxpayer unfriendly, and harmful to the IT industry.

I respectfully urge that you reject this proposal outright.

Thanks for your attention to this important matter.

Sincerely,

Jim Carroll
60 Newport Drive
Westford, MA 01886

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

Mr. Peter Quinn
Chief Information Officer/Director
Information Technology Division
Commonwealth of Massachusetts
200 Arlington Street
Chelsea, MA 02150

Dear Director Quinn:

Hewlett-Packard Company applauds you and your colleagues for your leadership in enabling the Commonwealth of Massachusetts to reap the benefits of a standards based computing environment. Specifically, we would like to affirm our support for your Enterprise Technical Reference Model v. 3.5 - Public Review Draft.

Hewlett-Packard believes that the Commonwealth is taking the right approach by focusing on the effective use of standards, rather than adopting policies favoring or precluding specific products, technologies, or development methodologies. This focus on standards, especially those derived from neutral, multi-vendor standards processes, will provide Massachusetts and its citizens with two important benefits:

1. Cost savings over time from competition among a steadily broadening selection of interoperable products.
2. Enhanced quantity, quality, and timely availability of computer based governmental services because the interoperability advantages inherent in more standardized data representation.

In summary, Hewlett-Packard supports the direction in which you are leading the Commonwealth and would welcome the opportunity to be of assistance in implementing your plans.

Respectfully yours,

Dr. James R. Bell
Director of Industry Standards
Hewlett-Packard Company

From: MJ Shoer [mshoer@jenaly.com]
Sent: Friday, September 16, 2005 1:17 PM
To: IT IT Procurement Official
Subject: The State of Massachusetts Open Document Mandate

Dear IT IT Procurement Official:

Your recent proposal to mandate an open-source-only data format (e.g., Open Document) for the Commonwealths needs is unnecessary, wasteful, costly, taxpayer unfriendly, and harmful to the IT industry.

I respectfully urge that you reject this proposal outright.

Thanks for your attention to this important matter.

Sincerely,

MJ Shoer
P.O. Box 1132
Portsmouth, NH 03802-1132

From: Sean Toner [sean.m.toner@gmail.com]
Sent: Friday, September 16, 2005 5:27 PM
To: Standards (ITD)
Subject: Thanks for supporting the Ooo free software movement

**NATIONAL FEDERATION OF THE BLIND
in Computer Science**

3000 Grand Avenue, Apartment 810

Des Moines, Iowa 50312

September 14, 2005

Mr. Peter J. Quinn
ITD Director & Chief Information Officer
Commonwealth of Massachusetts
State House

Room 373
Boston, Massachusetts 02133
(peter.j.quinn@state.ma.us)

Dear Mr. Quinn:

The National Federation of the Blind in Computer Science has reviewed a document published by the Information Technology Division which sets forth a plan for the Commonwealth of Massachusetts to adopt the XML interoperability standard. We observe that there is no reference in the document to accessibility to data and application software by people with disabilities, let alone the impact that the adoption of the new standard will have upon employees of the Commonwealth who use screen access technology for the blind. Given the lack of any reference to accessibility by people with disabilities, we are deeply concerned that as of January 1, 2007, all agencies within the Executive Department will be required to "use office applications that provide native conformance with the OpenDocument standard" and "configure the applications to save office documents in OpenDocument format by default."

The document says that "The OpenDocument format is currently supported by a variety of office applications including OpenOffice.org, StarOffice, KOffice, and IBM Workplace." There is little information available concerning the accessibility to people with disabilities of the aforementioned software. Far more accessible to people with disabilities is the Microsoft Office suite. Yet, the document mentions it only in passing as a platform from which agencies are expected to migrate. In our view, any planning effort undertaken by the State of Massachusetts to convert to the XML standard and, by extension, the OpenDocument format must take into consideration the significant success achieved by the blind in their use of the Microsoft Office suite and the Windows operating system. Not to do so will severely damage the success that the blind of Massachusetts have already achieved--both within and outside of state government.

We ask that you reconsider the plan to convert to XML and the OpenDocument format and begin immediately to begin addressing issues of accessibility for

Peter J. Quinn
September 14, 2005
Page 2

the blind and other people with disabilities. The National Federation of the Blind in Computer Science is eager to participate in any discussions you have on this topic. Please have these discussions. Innovation is a wonderful thing but only if everyone benefits from it. We, the blind, want to continue to enjoy the access to computers that we have today. Please do not put another road block in our path.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Curtis Chong". The signature is fluid and cursive, with a long, sweeping tail that loops back under the name.

Curtis Chong, President
NATIONAL FEDERATION OF THE BLIND in Computer Science

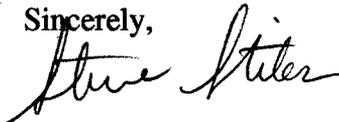
September 3, 2005

Peter Quinn, Chief Information Officer
Information Technology Division
200 Arlington Street
Chelsea, Massachusetts 02150

Dear Mr. Quinn,

I have been following the controversy over Massachusetts adopting open standards for dealing with the public for quite some time. I am writing to you to say that I strongly approve of your proposal to use OpenDocument as the Massachusetts government standard for office documents as well as the other standards that you propose. I wish you every success in getting this proposal accepted. Hopefully you are just the first of many governments to adopt OpenDocument as their standard.

Sincerely,

A handwritten signature in black ink that reads "Steve Stites". The signature is written in a cursive, flowing style.

Steve Stites

2933 Marshall Street
Falls Church, Virginia 22042

09-03-2005

Information Technology Division
200 Arlington Street
Chelsea, MA 02150

Attn: Peter Quinn, Chief Information Officer

Re: Request for comments concerning adoption of OASIS Open Document Format for Office Applications (OpenDocuement)

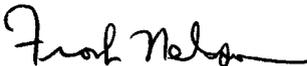
Mr Quinn,

Per the attached.

Congratulations on a sensible and wise move towards a final adoption of OASIS Open Document Format for Office Applications (OpenDocuement) as the state's standard for office documents. Use of this open format should insure that the state is not dependent on one provider of applications since all application providers can use the format.

The list of open and acceptable formats that have been identified are truly a benefit for government and private sector use long into the future (regardless of the provider).

Best regards,

A handwritten signature in black ink, appearing to read "Frank Nelson". The signature is written in a cursive, flowing style.

Frank Nelson