

September 6, 2005

Peter J. Quinn
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TO: standards@state.ma.us

Dear Mr Quinn:

The [ETRM draft document v3.5](#) 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 view 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](#) 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.

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cc:

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