A Deluge of Facts KOs OOXML (Office Open XML)

Microsoft’s position is hardening as the ISO vote on OOXML (DIS 29500) in Geneva approaches at the end of this month. We know more clearly now how Microsoft and its proxy group, ECMA, will position Microsoft’s OOXML specification in advance of the vote. In short, Microsoft is betting that its influence with National Bodies will allow it to push through a specification which elevates its own interests over that of truly competitive, open international standards. In the end, it will be Microsoft’s own inflexibility that will be its undoing, and that undoing means knocking the OOXML out of approval for ISO status.

ECMA, a RIAA-like industry group dedicated to advancing its members’ interests, published its responses to comments of the ISO National Bodies in response to Microsoft’s Office Open XML application for ISO standardization. The ECMA proposals will be discussed at a Ballot Resolution Meeting (BRM) in Geneva after which the National Bodies may reconsider their original vote.

ECMA makes an apparently false statement several times throughout its response: “Although no reference implementation or interoperability test suite is available at this time, a growing number of implementations of ECMA-376 are becoming available.”

That statement is not true. What ECMA does not say is that no one has implemented ECMA-376 OOXML in full or even close to it. In fact most ECMA referenced implementations are just using filters, converters or a file viewer. And as we know, Office 2007 is writing its own custom XML. Office 2007 lacks a “Save As OOXML (ECMA 376)” write that would make it possible to conform, verify and validate applications relying on the specifications.

So there is still no present implementation of what may or may not become an international and/or U.S. national standard.

It is strange indeed that the OOXML format submitted to ECMA and ISO is not implemented even in MS Office 2007: Nor does it appear that OOXML can ever be implemented in Office 2007 or future versions, at least not in the proposed ECMA form as it exists today. And that’s the only form under evaluation for the time.

Since OOXML appears impossible to either implement or interoperate with, and this situation has persisted since day one of the specification, it is possible to conclude that Microsoft does not intend to implement OOXML itself as an open standard nor to make it available to competitors for purposes of interoperability.

Microsoft Office 2007 also appears too brittle to handle the required changes proposed by ECMA; and a lot of the national standards bodies’ comments call for changes that Microsoft would not nor could ever implement. It is expected it won’t try. For example, subdocument types in Microsoft Word such as
footnotes, endnotes, tables, and frames that must span page breaks have apparently long been largely off-limits to Microsoft developers for repair of serious bugs.

Technically, it would seem much easier for Microsoft to implement ODF than to even begin to try to standardize the diverse file formats in Office 2007 or to conform later versions of Microsoft Office with OOXML.

**Microsoft will make you chase OOXML forever:** Not even one complete OOOXML has been implemented and they making developers and consumers chase up to six versions already:

1) OOXML 1.0 (i.e. ECMA 376 today)
2) MS-OOXML 2007 (i.e. OOXML 1.0 + all undocumented bits -unimplemented features)
3) OOXML 1.0 Second Edition (whatever is the outcome of Feb’s BRM)
4) MS-OOXML 2007 Service Pack X (Whatever parts of OOXML 1.0 Second Edition implemented by MS Office)
5) Office 2009 Beta 1 (MS-OOXML 2007 + undocumented extensions)
6) Office 2009 (????)

**OOXML can never be Interoperable or Implemented:** A decision to push the OOOXML specification as an ISO standard would launch the beginning of a true Digital Divide between countries, institutions, businesses and regular folks who adopt open standards. This doesn’t include those individuals and businesses who have opted to use vendor-controlled formats and are now locked into those choices. Think of a “black hole” for your data. In other words, it would become a new interoperability nightmare between office suites.

One of the many reasons OOOXML cannot interoperate with third parties is that Microsoft is still hiding the migration tables that make it possible for them to create OOOXML files from binary files. Those tables simply are not provided in the specifications, despite the stated goal that Microsoft is doing so openly. As a result, only Microsoft can reliably migrate binary formats to the new formats, which provides them with a competitive advantage (everybody else is excluded).

**BSI (British Standards Institution)** - “The compelling need exists for an open document-format standard that is capable of creating and preserving the billions of documents that have been created in the preexisting binary formats...” This does not mean that the standard has to be a new XML representation of the preexisting binary formats. There is already an open document-format standard that is capable of preserving the documents, and that already has widespread use and for some time its evolution has “enjoyed the checks and balances afforded by an open standards process”.

**BSI (British Standards Institution)** - “The OOOXML could qualify if there is a need for another open document-format standard alongside existing established standards, and how the new standard would interoperate with established standards. OOOXML has not yet been proven to be interoperable nor implemented, as no conforming consumers and producers have yet been created. Another claim which cannot be made is implementation of an application that produces and consumes conformant OOOXML. Both interoperability and implementation are seemingly impossible.”

Using products from a single supplier that cannot be implemented by another party impedes innovation, competition and choice, which will increase costs through decreased competition and decreased flexibility.
The XML proposed in OOXML is not a general purpose language for Office documents: That’s the real irony. The whole point of XML is to create formats which can produce data which can be freely interchange between applications out there. That includes even those applications which don’t exist quite yet, but will soon. Therefore that an XML-based format should be designed in such a way as to contradict the fundamental purpose of XML should be heavy in clues about what’s going on. But, here is the problem: there is no such clue because OOXML is custom fit for Microsoft’s products only and ties consumers into the MS environment.

National Boards must also understand that OOXML is a different format. They must realize that using it implies the purchase of new software, in some cases the purchase of new hardware. In all cases, it involves the conversion of files to the new format, which only Microsoft can accomplish.

Office Open XML is not 6000 pages long: The complexity, extraordinary length, technical omissions and single-vendor dependencies combine to make alternative implementation legally and practically impossible. Add the additional 2300 pages in bug fixes and an annex part, then you add on the undocumented bits, stuff related to old binary codes to ensure “BACKWARD COMPATIBILITY LOCK-IN”, you have probably 100,000 pages once you include substantial semantics lacking in the current proposal.

One of the reasons people use XML in the real world is because this programming contains agreed-upon syntax and semantics. It’s implicit that, without an open XML design where everything is documented, Microsoft’s implementation is excluding others from reliably rendering documents like Office 2007 without using Office 2007.

The Closed Development Cycle of OOXML: Ecma International (“Ecma”) Technical Committee 45 (“TC45”), which maintains OOXML, works in an opaque manner. There are no public mails lists, voting, balloting and appeals policies not published. OOXML is a format that was pre-developed within Microsoft’s development group and Microsoft retains the right to veto any changes that are proposed in TC45. Further, the meeting activities of TC45, the committee’s work-in-progress, documents and e-mail are not public. It is also difficult to participate in the development of OOXML, membership requirements are high and limiting and generally only available by invitation through one of the corporate members. And all public comments are suppressed. Read More on Achieving Openness – ODF vs OOXML by Sam Hiser

The development of Microsoft Office is also done in secrecy so we do not know what will be the default file format of Office 14 (Office 2009)? Will it be identical to that described in Ecma-376? We don’t know, because Microsoft does not provide a clear roadmap. This lack of direction provides Microsoft with a huge competitive advantage.

Language and Linguistics Problems in OOXML: Microsoft also did a bad job in creating a document format for the whole world, which is an important requirement for an ISO standard. Considerations for users in Israel and many Muslim countries were excluded in the specification of OOXML. The weekend continues being only Saturday and Sunday which effects Iraq, Algeria, Sudan, Bahrain, Qatar, Bangladesh, Israel, Jordan, Libya, Pakistan, Syria and the United Arab Emirates:

a) There is no way to represent minority languages (does not use ISO 639)

b) There are still a lot of borderlines images that match only with US culture and doesn’t provide
alternatives for other cultures.
c) It is not possible to make numerations in Greek, Tamil, Armenian, Ethiopian, etc. Only in Arabic
numbers (occidental set) and Latin.
d) Doesn’t use W3C XLS: FO, a language for transforming XML documents and an XML vocabulary
for specifying formatting semantics
e) Microsoft does not support, is the RFC 3987 specification, which defines UTF-8 capable Internet
addresses. Consequently, OOXML does not support the use of Chinese characters within a Web
address.

Office 2007 OOXML Spreadsheets is a closed binary format: Some of the binary blobs of .XLS are
moved over .XLSX(M) as is, they are not XML which is in contradiction with what the standard is for
in the first place. As for XML parts themselves, you can’t add your own XML within Microsoft
spreadsheet’s XML (placeholders, markers,…). since it automatically corrupts the file. It undermines
the reason why people use XML , and the regular XML tooling in particular (XSLT, tagging,
templating, and so on). Read More at OOXML is Defective by Design by Stephane Rodriguez

OOXML Offer No Second Need: The native and lossless support of ODF in Office 2007 would have
been a fairly spectacular demonstration that the file format that Microsoft is proposing is superior to the
existing ISO ODF standard. But that’s not what Microsoft chose to do, and neither the partners that
joined Microsoft at ECMA.

Instead, Microsoft simply chose to proceed for economic reasons with an inferior file format that isn’t
needed. For decades, third party vendors have had to reverse engineer Microsoft Office to work
effectively with Microsoft Office, and OOXML will extend that problem into the future, as the crucial
parts of the spec are not well-documented, despite its massive size.

From the start OOXML was inappropriate for Fast-Track processing: And now ECMA and
Microsoft want to continue rushing it. They know that further review will only lead to revelations of
more problems. It should be clear now that DIS 29500 needs more time in committee process to mature
as a specification before consideration as an International Standard.

Furthermore, the ECMA proposed changes to DIS 29500 fail to address harmonization; naming
confusions; consistency of fixes is a problem, support for legacy documents, IP Issues specifically in
regards to GPL Licenses used by Open Source, Microsoft’s main competitor/antagonist; ECMA
response to the date problem only has complicated matters; and many of these questions on OOXML
remain unanswered.

Can we in good faith endorse a standard that is not technically sound with conflicting recommendations
on technical remedies? Can we, in good conscience, give ISO approval to a specification which will
benefit only one company that has subverted the standards process, which is submitting the
specification only to drive sales of their office productivity suite, and which has no good faith interest
in actually deploying the specification?

“The negative impact of standards for competition are mostly caused by a biased endowment with
resources available for the standardization process itself. Therefore. even when the consensus rule is
applied, dominant large companies are able to manipulate the outcome of the process, the specification
of a standard, into a direction which leads to skewed distribution of benefits or costs in favor of their
own interests.” Knut Blind
As the National Bodies contemplate their upcoming votes, it is important to remember that the true purpose of OOXML is to delay adoption of the current ISO document standard, ODF. We, the global community, should look askance at Microsoft’s bad faith ISO submission, and discourage the National Bodies from granting ISO status to this ill-conceived specification called OOXML.

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Other articles on OOXML

- Reasons for National Bodies to Vote No for OOXML
- The Deprecated “Smoke Screen” of MS Office Open XML (OOXML)
- Microsoft cuts off old documents and why Open Formats matter
- OOXML Questions Microsoft Cannot Answer in Geneva