



ISO  
att: Vice-President Jacob Holmblad  
Kollegievej 6  
DK-2920 Charlottenlund

Copenhagen, May 30, 2008

### **Complaint regarding the certification procedure in Danish Standards**

Dear Jacob Holmblad

The Danish Open Source Business Association hereby submits a formal complaint regarding the certification procedures after the meetings in Danish Standards committee S-445 (previously S-142/U34), as well as the decision to change Denmark's vote to a yes in connection with the treatment of DIS 29500. I write to you primarily in your position as Vice-President for ISO, secondly as CEO for Danish Standards.

The Danish Open Source Business Association informed Danish Standards in a letter of March 22 2008 that the Danish requirements to DIS 29500 have not been met. We summarized our points of view in the following five main points:

1. Microsoft's Office formats hinder interoperability
2. XML forms are lacking
3. The complete specifications text is still not ready
4. Contradictory formulations
5. The maintenance of DIS 29500 is not in place

I would also like to point out that after the round of hearings during the summer of 2007, agreement had been reached in the committee to formulate 168 change proposals and on this basis recommend a "No with comments." In order to change this position, according to Danish Standard's rules, there had to be a consensus in the committee. Furthermore, according to ISO's regulations, the complete specification must be ready at the latest 30 days after BRM, so that the committee can consult the specification in order to verify to what extent the Danish technical objections were accommodated.

The discussion on the meeting March 26 was based on the unfinished specifications draft and on editorial notes from BRM. This was far from sufficient to assure the committee that the 168 change proposals had been accommodated. Therefore, as you know, there was a great deal of disagreement during the meeting. Quite simply, we discussed specifications that did not yet exist.

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Two months after Danish Standards announced the changed vote, we note that:

- There never has been agreement in the committee regarding whether the Danish requirements were met
- The five main points in our letter of 22 March 2008 have still not been solved
- The specification is still not ready, so that we can make certain that the change proposals have been incorporated

On this basis, The Danish Open Source Business Association ascertains that the procedures and the decision conflict with ISO's rules, and the process has caused considerable damage to the reputations of Danish Standards and ISO.

It is highly unusual that there are still no combined specifications, and I wish to bring to your attention the fact that Deputy Director of Danish Standards, Jesper Jerlang, in Danish Computerworld on May 22 admits that ISO's rules have been broken because Danish Standards has not received the final specifications. This is stated in section 13.12 in ISO's JTC 1 directive, which states:

"In not more than one month after the ballot resolution group meeting the SC Secretariat shall distribute the final report of the meeting and final DIS text in case of acceptance."

The process has thus been formally annulled now for two months - since March 29, at which time the specifications should have been sent to the national standardization organizations. The prerequisites for the fast-track procedure no longer exist, and, therefore, I expect that ISO recommence the case.

I also expect that Danish Standards will inform ISO that it wishes ISO to recommence the case. The legitimacy of an ISO standard can only be sustained, when the certification process and foundation can not be called in question. An over-hasty, and therefore probably incorrect completion of one standard can bring other standards and the very system of standards in discredit.

Kind regards,

Morten Kjærsgaard  
Chairman of OSL

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