



## **AFUL Interop Working Group comments**

**on the  
Gartner Final Report**

**concerning the  
Revision of the European  
Interoperability Framework (EIF)  
and  
Architecture Guidelines (AG)**

September 2007

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# Abstract

This document is the official reaction and answer of the *AFUL Interop working group*<sup>1</sup> to the preparatory study labelled as the *Gartner final report*<sup>2</sup> in the course of revision of the European Interoperability Framework (EIF) and Architecture Guidelines (AG)<sup>3</sup>.

The *AFUL Interop working group* is deeply concerned about the Gartner report and thinks that it has too many flaws to be a sound basis for *EIF v2.0*. The present document discusses the main problems associated with this report and provides some recommendations about the future European Interoperability Framework.

Mainly, we advocate for open standards to be and remain a central point in *EIF v2.0*. We also advocate for the use of FLOSS<sup>4</sup> where security is a concern.

This document is also permanently available online at the following canonical address :

<http://www.aful.org/gdt/interop/comments-gartner-final-report-eif2>

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1 Groupe de travail Interop: <http://www.aful.org/gdt/interop/index>

2 Gartner final report: <http://ec.europa.eu/idabc/servlets/Doc?id=29101>

3 Revision of the EIF and AG: <http://ec.europa.eu/idabc/en/document/6227>

4 FLOSS: Free/Libre/Open-Source Software

# Involvement

Even if we regret that the Gartner report and the IDABC website are only available in English, AFUL proposes and wishes to participate actively in the works concerning the revision of EIF and similar works, reports and activities initiated by IDABC.

# 1 Our reservations about the Gartner Report

## 1.1 The report does not correctly identify the real barriers to interoperability

In its section 2.2, the Gartner Report discusses four main barriers to interoperability :

- Policy makers
- Administrations
- IT departments
- Accessibility

This taxonomy displays a confusion between (3) organisational and (1) technical barriers. Moreover, it neglects the fact that a prior condition has to be in place if all these barriers are to be overcome – namely the Technical interoperability of formats and protocols.

In order to achieve this goal, information systems must mutually understand each other, the easiest way to ensure this result is to use the same set of formats and protocols. However, in the report, this crucial matter is discussed only cursorily in the course of one particular section.

Indeed, the report identifies two main technical problems :

- *The traditional stovepipe architecture [...] hinders real-time functionality reuse. The proposed interoperability architecture implies that various business units across administrations should be able to invoke the same elementary business function*
- *Business processes are hard coded in the legacy applications. This means that the implementation of each business process change requires IT specialists that are expensive and in short supply.*

This should lead to the natural conclusion that progressive unification towards one set of standards is the best way to achieve interoperability. Otherwise, if the sets of standards used by business processes are allowed to multiply indefinitely, interoperability can only be achieved through the separate, careful, implementation of each set of standards – a process requiring IT specialists every time and this, as is acknowledged by the report, is very costly. This complex solution is the very one illogically advocated by the report.

## **1.2 Gartner's reservations about EIF 1.0 policies**

### **1.2.1 The prescription of detailed technical standards**

We would like to refine and correct the Gartner's first reservation made in section 3.3 (*"prescribing detailed technical standards"*), we believe that Gartner's approach is inappropriate. Too complicated technical standards are inefficient as they constrain implementations and eventually innovation. A successful standard should involve complexity and details only to the extent needed to achieve interoperability between various implementations.

For example, the fundamental reason behind the success of the Internet Protocol (IP) against competing standards such as X25. In particular, It was designed to be dumb, meaning that it made minimal assumptions about which kinds of applications used the protocol. This allowed Internet to be versatile and to become the success we know. Such a lesson should never be forgotten.

Another good example of this point is the 6000 more pages of the document describing the Microsoft Office OpenXML format. While detailed specifications are mandatory, a too huge mass of documentation becomes a barrier.

### **1.2.2 The proposed amendment to recommendation 14 (including "other recognized standards") of EIF 1.0.**

We strongly disagree with Gartner's second reservation (*"dogmatic focus on open standards"*) and with the proposed amendment to recommendation 14. A non-open standard is a barrier to competition as it is tougher to implement for a vendor which do not control it; it also creates a potential for vendor lock-in as such standards are difficult to implement correctly by third-party vendors. Consequently, we do not see any compelling reason to depart from the previous IDABC recommendation.

## **1.3 Gartner's recommendation of multiple standards support is inefficient**

### **1.3.1 Supporting multiple standards may create vendor lock-in**

Supporting multiple standards is difficult, both for customers (individuals, business, public sector...) or for vendors. Resources will have to be dedicated to support the same function in a variety of ways. Vendors will have to divert scarce resources to implement different standards, decreasing the overall quality of software. They may eventually drop support for multiple standards, as it consume resources. If the winning standard is non-open, this will create vendor lock-in as the standard owner will get a huge advantage for its implementation.

Moreover, once its competitors begin to catch up, it may decide to change the standard. Firms like Microsoft have a strong proven record of such practices. Multiple standards simply correspond to a covert way to protect de facto monopolies on captive markets. A true competitive attitude rests on creating a common platform (open standards) and then let competing firms build their specific products on top of it. One has simply to imagine transposing the Gartner proposal in favour of multiple standards to the question of railway track gauges to measure the profound inefficiency (not to say idiocy) of the recommendation.

### **1.3.2 Good unique standards allow the market to develop beyond the most optimistic expectations**

HTML is the unique (open) standard for web pages. And there is a lively competition in the browser market. Beyond the browser market, HTML is used by other tools such as instant messengers, e-mail software...

We could use other examples. What replaced ultimately the floppy disk as a mean to exchange data. Was it proprietary LS-120 or other defunct proprietary hardware such as Zip drives ? No, it was USB flash drives. And the market flourished for both vendors and consumers.

A flexible and really open standard increases competition and enables the creation of new products, thus satisfying both producers and consumers (but not the monopoly-minded firms).

### **1.4 The report misinterprets Directive 1998/34/EC**

In its section 3.3, the Gartner report says that the directive does not allow international standards to be linked with EU legal frameworks and policies. This is not correct. While this directive does not define a list of international organizations which produce standards that can be associated with EU legal framework and polices, it allows the use of fast-track procedures for the use of standards produced by recognized standards-producing international organizations such as ISO (See articles 1.4 and 8.1 of the directive).

### **1.5 The economic analysis in the report is at the very least puzzling**

In the section 3.3, we come across a strange statement : "*EIF v2.0 should facilitate the most profitable business model(s) of cost versus public value*". Nowhere in the report is defined which business model it is. The vendor one, the consumer one, the public sector one ?

If we assume the business model is the one of the public sector, then maximising its profit is the same as maximising public value as the ultimate target of the public sector is to maximise public value.

If we assume that what the Gartner report is referring to is exclusively the

vendor business model, then we must conclude that the Gartner report is supporting monopolies for software vendors: this is indeed the best way to maximize profits. We respectfully submit that the Directorate General for Competition may hold a different opinion on the matter.

## **1.6 Security measures lack FLOSS recommendations**

Security is one of the objectives of IDABC as stated in section 2.1.2 ("Products of IDABC") and one of the requirements and assumptions of the Pan-European e-government Services as stated in section 4.4 ("Requirements and assumptions"). Thus we find it astonishing that Free/Libre/Open-Source Software (FLOSS), which use was a goal of EIF 1.0, is not mentioned, as it is the best way for Member States to audit and control what the software is doing. We strongly recommend that this point is made in EIF 2.0.



## **2 The good points**

It's also important to note the good points that can be found in the Gartner report. We want to highlight some of them.

### **2.1 Web services**

The report focuses on XML, web services, SOAP and REST. This is something we fully endorse too, providing the XML is used in conjunction with schemas of open standards. REST applications are simpler to understand and maintain, resilient, very well fit for scalability and easier to make and keep accessible.

### **2.2 Security concerns**

The Gartner report is focusing a lot on security which is really essential. For example it insists on good data protection rather than transport protection.

## 3 Recommendations

### 3.1 Maintain the course set in EIF 1.0

Anything more than temporary acceptance (for legacy applications and with tough deadlines for termination) for non-open standards is suboptimal. The recommendation 14 of EIF 1.0 should be kept in EIF 2.0 without modifications.

### 3.2 Deepen the support for really open standards in EIF 2.0

Open standards are efficient. Moreover, IDABC should support one standard per function (contrary to the Gartner recommendation, see section for a discussion). But the chosen standards must be designed in order to be easily implemented by everyone and thus widely adopted, as said in section 2.2.1. To achieve this, they must not be tied to a particular line of products (for example Microsoft Office), a particular vendor (for example Oracle) or even a particular implementation. This is the best way to avoid vendor lock-in.

To take an example, the standard for office applications should be the open standard Open Document Format (standard ISO 26300 since May 2006) and not its contender Office OpenXML. While apparently open, Office OpenXML is tightly linked to Microsoft line of products and any non-Microsoft applications will have difficulties to implement it correctly<sup>5</sup>. It is no wonder that OOXML recently failed to gain the support needed to be accepted for fast-track standard approval procedure at ISO<sup>6</sup>. Consequently, we recommend that IDABC should continue its support for really open standards such as ODF (support which has already been demonstrated in the 6<sup>th</sup> December 2006 PEGSCO recommendation), by including them in EIF 2.0.

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5 An extensive discussion of Office OpenXML defects can be found here : [http://www.grokdock.net/index.php/EOXML\\_objections](http://www.grokdock.net/index.php/EOXML_objections)

6 See <http://en.wikipedia.org/wiki/Ooxml#Standardization> for details

# About the French speaking Linux and Libre Software Users' Association

Since 1998, the French speaking Linux and Libre Software Users' Association (AFUL) aims to promote libre (ie free as in “free speech”) software, especially operating systems like GNU-Linux, and help spreading open standards. AFUL is a non-profit association that gathers users, professionals, companies and other associations based in more than 10 French-speaking countries and regions (France, Belgium, Switzerland, Quebec, French-speaking African countries, etc.).

- AFUL is the key contact to reach the French speaking libre software community and maintains the reference [list of the French speaking Local Linux Users' Groups \(LUG\)](#).
- AFUL is a key player in the education field with agreements with the [French Ministry of Education](#) (since 1998) and with the [French Speaking University Agency](#) (since 1999).
- AFUL has been considerably involved with studies, reports and law making processes regarding the evolution of French copyright legislation and also related legislation regarding digital media, including the Internet. AFUL participates to the work of the French Higher Council on Copyright (CSPLA, Conseil Supérieur de la Propriété Littéraire et Artistique), especially regarding the current evolution towards more production of open access or free works, including - but not limited to - free software.
- In 1999, AFUL was the leader of the movement against software patents in Europe and one of the founders of the Eurolinux Alliance. AFUL also supports the Economic Majority actions.
- AFUL maintains a [list of the economic models linked with libre software](#). Its members continuously debate to analyze, evaluate and give advice in the economical field.
- In recent years, computers and electronic devices have been sold bundled with pre-installed software. This situation prevents customers from choosing the software they want and forces them to pay for what they don't need. Since 1999, AFUL has been one of the most active group worldwide in the fight against tied sales and in providing information to computer customers. AFUL financially supports court actions and has set up a petition ([racketiciel.info](#)) against unwanted software with the aim to free customers from the necessity of buying Microsoft Windows or any other software.
- AFUL helps funding actions and events such as the Libre Software Meeting.

## About the AFUL Interop working group

The AFUL Interop working group is dedicated to the promotion of interoperability in French-speaking countries. It has already commented on several standards proposals.

The Interop working group has already commented the French administration digital accessibility framework (RGAA)<sup>7</sup> and the draft French administration interoperability framework (RGI)<sup>8</sup>.

AFUL is also a member of AFNOR, the French national standards body and is participating in its analysis of ODF and OOXML.

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<sup>7</sup> <http://rgaa.referentiels.modernisation.gouv.fr/>

<sup>8</sup> [http://synergies.modernisation.gouv.fr/article.php?id\\_article=630](http://synergies.modernisation.gouv.fr/article.php?id_article=630)