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US National Body Contribution in Response to JTC 1 N 9609 - Directives Draft section on archiving for incorporation in proposed standing document EDPDA

The United States is aware of evolving ISO and IEC archiving procedures and appreciates that ISO's participation in a SWG-ARM meeting was an attempt at coordinating these efforts. Therefore, in light of the evolution of current ISO/IEC activities, the contribution from the UK appears to be premature.

The United States further notes that Section 15 of "JTC001-N-9718_Standing Document on EDPDA" contains the archiving material found in Section 4.6 of the JTC 1 Directives. The proposal from the UK in JTC 1 N 9766 to replace Section 15 material raises concerns which must be fully discussed before they could be adopted:

- 1. ISO/IEC document archival responsibilities should be documented in the ISO/IEC Directives (not in the JTC 1 Supplement).
- 2. The provision of a document in revisable text form is appropriate, but the reference to the JTC 1 Directives must be corrected to the current document set. This is not particularly an archiving issue.
- 3. The term "metadata" is introduced without definition (and it is not used in the JTC 1 Directives).
- 4. The statement about differences between ISO and IEC handling of documents does not indicate what JTC 1 should be doing about WG archiving of documents.
- 5. The reference at the end of 15.1 to a "machine-readable, structured format" is not clear, particularly in how it relates to approved document formats in section 6.
- 6. Section 15.3 greatly extends to concepts of which documents must be archived, and appears to place this responsibility on WGs.
- 7. The proposal to modify section 14 would place an obligation on WGs to develop business plans and establish archival policies.

The United States encourages JTC 1 to consider this contribution, and other SWG-ARM recommendations, and coordinate them with the Central Secretariat and ITSIG to avoid duplication of, or divergence from, ISO/IEC archiving procedures. At this time, the United States recommends retaining the current archiving material in the JTC 1 Supplement.