

## Comments

### MoReq2010 - Draft - 102 Application Programming Interface (API) (29/11/10 to 26/12/10)

Comment by	Mr Marc Fresko
Comment ID	dc102_5
Response Date	22/12/10 23:16
Consultation Point	Proposal 102.1 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.2

Comment on draft

#### MAJOR COMMENTS

As I understand it, there is no market demand for an "arbitrary" API-only MCRS. Rather, if I understand correctly, the primary intent of 102 is to allow an MCRS to act as a records repository for so-called "legacy systems" and other IT applications.

This section, by requiring that ALL core requirements can be met using APIs (R102.3.2, R102.3.3) actually creates an arbitrary API-only MCRS. The requirements for a records repository are much, much less than the present core requirements, AND they include some non-API administrative requirements. I am afraid I regard it as almost inconceivable that this arbitrary API-only construct would ever exist or be used.

The requirements for APIs have to be developed again from scratch.

## MoReq2010 - Draft - 101 Graphical User Interface (GUI) (29/11/10 to 26/12/10)

**Comment by** Mr Marc Fresko  
**Comment ID** dc101\_5  
**Response Date** 22/12/10 23:18  
**Consultation Point** Proposal 101.3 ([View](#))  
**Status** Draft  
**Submission Type** Web  
**Version** 0.1

Comment on draft

### MINOR COMMENTS

R101.3.6;I don't think this requirement applies to a GUI, though I could be wrong.

### TYPOS, GRAMMAR ETC.

R101.3.1:"GPI" should be "GUI".

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**Comment by** Mr Marc Fresko  
**Comment ID** dc101\_6  
**Response Date** 22/12/10 23:21  
**Consultation Point** Proposal 101.1 ([View](#))  
**Status** Draft  
**Submission Type** Web  
**Version** 0.1

Comment on draft

### MAJOR COMMENTS

101.1.5:The statement " The MCRS may be compliant with the following modules of MoReq2010: none" is surely wrong!Please revise or – more likely – delete.

101.1.5:" The MCRS must be compliant with the following modules of MoReq2010: 1. Core requirements " is surely incorrect.By definition, the MCRS complies with the core requirements.What you mean here is probably that functionality implemented in 101 must be consistent with it.I think...

### MINOR COMMENTS

The heading "Important information" is a bit self-serving, and should be changed to something more neutral.

## MoReq2010 - Draft - 1 Core (section 1.19 to 1.28) Glossary and tables (28/11/10 to 26/12/10)

Comment by	Mr Marc Fresko
Comment ID	dc19to28_6
Response Date	22/12/10 23:23
Consultation Point	Proposal 1.28 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1
	Comment on draft

### MAJOR COMMENTS

Add a value that means retention indefinitely or forever (or if it is already present, clarify it).

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Comment by	Mr Marc Fresko
Comment ID	dc19to28_7
Response Date	22/12/10 23:24
Consultation Point	Proposal 1.26 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1
	Comment on draft

### MAJOR COMMENTS

**This metadata model cannot be reviewed properly as it is incomplete. It needs more detail about each element. The tables in this section do not give all the needed information such as (among many others) description - without a description this cannot be reviewed. it is also important to show the links to the requirements (these are missing from the consultation draft).** As a minor example, what does M1.26.80 "Sequence" mean? Probably (but this is just a guess) it is the aggregation sequence number within its parent aggregation; but is it the next available number or the most-recently-used? Is it datatype integer, nonNegativeInteger, or something else?

Given what is missing, **it would not be logical for the DLM Forum to approve this section as it stands.**

There does not seem to be any metadata showing the identifiers of the MCRSs which have managed a record or aggregation. For a record or aggregation that is exported to several MCRSs serially over

time, this is important metadata. Similarly, there needs to be metadata about the import and export processes (when, who by, etc. etc.)

**Need to replace (or at a minimum) explain the column heading "Data Type" as the values in this column are not valid W3C XSD datatypes.**

Need to explain all the column headings.

Change title to "Table of metadata element definitions" (at the moment it is difficult to locate).

#### **TYPOS, GRAMMAR ETC.**

R1.12.28: This explains that a record "must ...clear" elements. Records can never do this, they lack the intelligence and ability. The MCRs must, however.

R1.12.28: the sentence beginning with "But..." is a bit clumsy (by definition). Ideally change it to say that the MCRS must not change the timestamp.

R1.12.30: "that record does not have a reviewed timestamp has been included" typo.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc19to28_8
<b>Response Date</b>	22/12/10 23:27
<b>Consultation Point</b>	Proposal 1.25 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
	Comment on draft

#### **MAJOR COMMENTS**

It is not possible to review this without cross references to the requirements. The cross references are missing. **It would not be logical for the DLM Forum to approve this section as it stands.**

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc19to28_9
<b>Response Date</b>	22/12/10 23:28
<b>Consultation Point</b>	Proposal 1.23 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

## MAJOR COMMENTS

It is not possible to review this without cross references to the requirements. The cross references are missing. **it would not be logical for the DLM Forum to approve this section as it stands.**

Incidentally, the list of alerts looks very short, though that may turn out to be correct.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc19to28_10
<b>Response Date</b>	22/12/10 23:30
<b>Consultation Point</b>	Proposal 1.19 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.2

Comment on draft

## MAJOR COMMENTS

Several important definitions are missing, and should be added. This is especially important because this draft introduces novel uses of terminology and also uses some terms differently than earlier MoReqs. The terms that need to be added include (and may not be limited to):

- . Active ( **extremely important** , needs to be defined in a way that makes it precisely clear what it means for each different entity type to which it applies).
- . Apply (as in applying a template, needed because the usage is not intuitive).
- . Apply (as in applying a retention schedule to an entity).
- . Atomic (R1.16.1).
- . Capture (verb)
- . Child
- . Component Type (as needed in R1.10.10)(but see my comment to that requirement).
- . Core requirements (with special focus on the relationship between section 1 and the extension modules).
- . Classification (noun) (for example as used in R1.10.2 but I think also elsewhere)
- . Create (noun), Creation (verb) (this is essential if the specification continues to use "create" in a non-intuitive way, I think to replace the earlier "capture").
- . Criterion (as in Search criterion), for 1.14.x.
- . Declare
- . Descendant (as in 1.14.17, only if unavoidable).
- . Inactive (see comment on Active)
- . Parent
- . Primary Classification
- . Secondary Classification
- . Stub (e.g. in R1.12.54)
- . Synchronisation
- . System Agent

- . Transfer (this is unexpectedly important - although the meaning of "transfer" is generally understood, there is a growing cadre of people worldwide who are being trained formally to believe that transfer means something different.)
- . Traverse
- . UUID

Generally, there is too much definition in the requirements and their comments, and not enough in the glossary. It is important that the glossary is complete and definitive. This is essential, and is particularly relevant to MoReq2010 because of its structure. **Definitions need to be removed from requirements and added to the glossary. References to definitions embedded in requirements need to be changed to glossary references** (e.g. change 'The term 'inspect' is defined in R1.5.10' to a glossary reference).

Further, glossary definitions must be self-contained and should not rely on requirements or their comments. So, **for example**, replace the incomplete definition of 'inspect' (currently 'a technique defined by MoReq2010 to allow a user access to the metadata elements of an entity. See R1.5.10.') with a complete definition: 'a technique defined by MoReq2010 to allow a user access to the metadata elements of an entity without the ability to modify them. It does not imply that an MCRS must implement a particular type of visual interface.' And remove the definition from R1.5.10. **This needs to be done throughout the specification.**

**Ideally, adopt a consistent glossary definition style. The formal approach used in ISO and BSI standards would be ideal.**

As often as possible, give sources for definitions, in order to increase their credibility/dissuade others from thinking they are arbitrary.

**Clone:** Separate the definitions of the noun and the verb. As currently concatenated, they sensedonotmake.

**Disposal Action:** isn't this what is known as "disposition" by Records Management practitioners?

**Disposal Hold:** (1) see my comment on R.13.8. (2) you cannot start the definition of an entity with the words "an entity..."

**Element Definition:** For consistency, delete word ""metadata".

**Entity:** "all data in the MCRS is split between entities". This is **not** a definition, it is a partial description. Replace with a standards-based definition of entity.

**Entity Type:** defining an "entity type" as a "type of entity" is ridiculous.

**Function:** Delete words "a definition of".

**Group:** defining a "group" as a "group of..." is likewise unacceptable.

**Main component:** Delete words "with more than one component".

**Select:** (1) Would "choose" be a better word than "isolate"? (2) You cannot use the word "group" here!

**Template (comment):** "*Applying a template to an entity will result in a pre-defined list of entities being created for that entity.*" Should this be "*Applying a template to an entity will result in a pre-defined list of elements being created for that entity.*"?

**User:** the definition is unacceptable as (a) it is recursive, and (b) it needs to be enhanced to make it clear that external programs communicating through an API are considered users (else much of the core wording has to be changed). How about something like: "(noun) Any person or external system authorised to access the MCRS." Also, giving two different meanings to the term user is poor practice. Consider dropping the second definition of a default role (this may mean changes elsewhere, but they are easy enough - if you mean "the default role of a user" just say so).

#### MINOR COMMENTS

**Record and Records System:** The comments giving extracts from ISO standards should be in italics.

## MoReq2010 - Draft - 1 Core (section 1.16 to 1.18) Non-functional requirements (28/11/10 to 26/12/10)

Comment by	Mr Marc Fresko
Comment ID	dc1-16to18_5
Response Date	22/12/10 23:31
Consultation Point	Proposal 1.16 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1

Comment on draft

### MAJOR COMMENTS

All of the following applies to 1.16, 1.17 and 1.18; and also to the non-functional requirements sections of the extension modules.

This section is not fit for purpose.

It contains an uncomfortable mix of questions: questions that are open, that are closed, and that are neither; questions about hardware as well as software; and questions that are imprecise (which is unavoidable in a model specification) but which have no guidance on how to make them precise (which can and must be avoided). Some questions are nothing to do with the solution, but are instead questions that a supplier might ask of a user organisation (e.g. N1.17.8). Some are unclear (e.g. N1.16.1). Several requirements are functional (N1.17.10 & 11 and others). Some are technical environment specification issues (e.g. N1.18.3). At least one serves no purpose I can think of (N1.18.6). At least two cannot be answered honestly (N1.18.9 & 10). At least one is phrased in a biased way (N1.18.15). And so on...

These sections need to be re-written from scratch, to meet the objective of a model requirements (MoReq) specification, providing guidance on how they are to be used.

## MoReq2010 - Draft - 1 Core (section 1.15) Exporting (27/11/10 to 26/12/10)

Comment by	Mr Marc Fresko
Comment ID	dc1-15_6
Response Date	22/12/10 23:33
Consultation Point	Proposal R1.15.1 to R1.15.9 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1

Comment on draft

### ERRORS OF FACT

**Surely it is not acceptable to state that R1.15.1 WILL be replaced when (a) you do not know with certainty that ECI will ever be adopted, (b) the level of it's acceptance and adoption are unclear; (c) it has not been debated by the DLM Forum? Surely the only acceptable wording here is something more like: " *The DLM Forum may eventually replace this requirement with one that specifies the export of entities using the W3C EXI*".**

### MAJOR COMMENTS

R1.15.2: The list of entities makes sense. But it would be helpful to provide some practical examples, such as all records assigned to a class, all of one aggregation...

R1.15.3: Due to lack of time I have not attempted to understand this. It is awfully complicated. But the phrase "another entity" in the beginning of the comment is confusing.

**R1.15.4: I cannot see the metadata element definition for this in 1.26; and Export is not an entity in 1.23, so it is not clear how it can have a system identifier.** (Is it meant to be a kind of **event**?)

R1.15.6, R1.15.7: Due to lack of time I have not attempted to review this.

R15.6 and R1.15.8: I think the export event should be added to the histories of the exported entities before they are exported (so that their history in the target system is complete). Please clarify.

## MoReq2010 - Draft - 1 Core (section 1.14) Searching and reporting (27/11/10 to 26/12/10)

Comment by	Mr Marc Fresko
Comment ID	dc1-14_14
Response Date	22/12/10 23:34
Consultation Point	Proposal R1.14.46 to R1.14.53 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1
	Comment on draft

### TYPOS, GRAMMAR ETC.

R1.14.51: the grammar in "...with or without [...] modifying it" is wrong. Please rewrite.

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Comment by	Mr Marc Fresko
Comment ID	dc1-14_15
Response Date	22/12/10 23:34
Consultation Point	Proposal R1.14.31 to R1.14.45 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1

### MAJOR COMMENTS

R1.14.31: Delete "for example" or replace it with more precise text.

R1.14.33: delete natural language requirement, as earlier.

### MINOR COMMENTS

R1.14.37: comment is incorrect. It claims that R1.14.34 "*...does not consider saved searches to be entities that provide greater context to a record over time*" R1.14.34 does **not** do this. Please rewrite. A simple correction could be to replace "*As noted in the rationale ...*" with "*Consistent with the comment...*"

R1.14.37 comment: The words "manipulated or" do not make sense. Delete these words (or delete the entire sentence - it is not clear why this digression about metadata arises in a requirement about deletion.

R1.14.39: It is not clear what "detail" means in its 4 occurrences in this requirement (and it should be "detailed" anyway). Delete. Likewise in subsequent requirements.

#### **TYPOS, GRAMMAR ETC.**

R1.14.36: the grammar in "...with or without [...] modifying it" is wrong. Please rewrite.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-14_16
<b>Response Date</b>	22/12/10 23:36
<b>Consultation Point</b>	Proposal R1.14.16 to R1.14.30 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

#### **MAJOR COMMENTS**

R1.14.16: "The MCRS must allow a user [...] to search for [...] **a combination of entity types**. "This opens the possibility of requiring the MCRS to allow pointless combinations such as "class and user" or "aggregation and alert". Specify combinations of entity type that can usefully be combined.

R1.14.17: uses "descendants" without defining it. Either define it in the glossary or (preferably) use words that have been defined already.

**R1.14.18: The requirements for the MCRS to be able to generate natural language is unnecessary (it definitely is not a core requirement of RM) and bizarre besides. Delete it. It will suffice (actually, it will be better) for the event history to contain the search in precisely the terms used to formulate it.**

R1.14.18: Hopefully this will be deleted (see above). But in case it isn't: the requirement is unclear. It refers to "express", which is vague and not useful. The true requirement is given in the comment, namely the need to be able to incorporate the natural language into the event history.

R1.14.26: Replace, or at the very least supplement, "lexicographical" with "alphabetical".

R1.14.28: "in accurate order" is meaningless. Please re-phrase.

R1.14.29: Need an additional requirement closely related to 1.14.29, namely that the total number of hits found is reported.

#### **TYPOS, GRAMMAR ETC.**

R1.14.22 comment: replace "a number of" with "several".

R1.14.23: replace "for each entity" with "for the entities". Note also this requirement could be problematic if pointless combinations of entity types are allowed (R1.14.16).

R1.14.24: "The MCRS must allow the user [to] specify which metadata elements to include for any related entities. "Surely this is far too vague and generic – there are all manner of kinds of relationships that could be included here. Need to clearly define a limited subset of relationships that the MCRS must be able to handle, or else delete the requirement.

R1.14.26: replace "relevancy" with "relevance".

<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-14_17
<b>Response Date</b>	22/12/10 23:37
<b>Consultation Point</b>	Proposal R1.14.1 to R1.14.15 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

### MAJOR COMMENTS

**R1.14.2: This only makes sense if "criterion" is defined; need to add a reference to the requirements that effectively define it, R1.14.8 onwards.**

R1.14.2: Does the example of "today" mean that the word "today" has to be supported? If so, what other words: "yesterday", "two weeks ago last Thursday"? In practice, a straightforward date would suffice and would be a better example.

R1.14.3: "...each search criterion must refer to either a metadata element ..." Given the way that "metadata element" is used throughout this specification (it is used to mean "instance"), this phrase does not make sense; it should be "...each search criterion must refer to either **the content of a metadata element definition...**"

R1.14.2 and R1.14.5: Both these have the effect of requiring that the MCRS must not impose any practical limit. Why does R1.14.2 specify an arbitrary limit of 20 while R1.14.5 not specify any limit? Might it be better to adopt the wording "no practical limit"? Note this applies to other requirements too.

R1.14.6 R1.14.7: This requires full text searching. That is a perfect example of what MoReq2 was criticised for, and what **MoReq2010 is meant to avoid**, namely features which are not needed in all systems. Some systems, including many that employ extension module 102 but not 101, would not need full text searching. Following the MoReq2010 design principles means that **this and all other requirements relating to full text searching must be relegated to an optional extension module.**

R1.14.11: Mandating the ability to process words such as "next quarter" and "yesterday" is another example of what **MoReq2010 is meant to avoid**, namely features which are not needed in all systems.

R1.14.6 comment; Full text searching does not necessarily involve searching for complete words. It can include searching for roots and stems. Arguably, it can include searching for concepts.

R1.14.12: Unclear - replace "factor in" with specific requirements.

### TYPOS, GRAMMAR ETC.

R1.14.7: The correct term is "relevance" not relevancy". But hopefully you will delete this requirements anyway.

## MoReq2010 - Draft - 1 Core (section 1.13) Disposal holds (27/11/10 to 26/12/10)

Comment by	Mr Marc Fresko
Comment ID	dc1-13_5
Response Date	22/12/10 23:40
Consultation Point	Proposal R1.13.1 to R1.13.12 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1

Comment on draft

### MAJOR COMMENTS

R1.13.7: remove verb "reasserting" and replace with another verb that is already used, such as re-applying. If for some reason "asserting" is essential it needs to be in the glossary. Ditto "lifting".

R1.13.7: "The MCRS must include a textual comment in the metadata of a disposal hold and must allow an administrator to modify this comment as part of creating the disposal hold under R1.13.3, lifting the disposal hold under R1.13.9, reasserting the disposal hold under R1.13.11 and at any other time." I think this is really three **distinct** requirements. The first is to be able to **create** a description. The second it to be able to modify it **as part of** the stated processes. The third is to be about to modify it as a **separate** process. This needs to be split into three atomic requirements. **I think** (but have not the time to check) that **a similar comment applies to other requirements** in this draft.

R1.13.7: As disposal holds are associated with litigation and regulatory challenges, need to specify explicitly that changes to descriptions are recorded in the entity histories.

R1.13.8: Is there a good reason to prevent reviews because of disposal holds? Note that correcting this will imply a better definition of "disposal hold" in the glossary.

### MINOR COMMENTS

R1.13.5: "The MCRS must allow an administrator to add aggregations and records to a disposal hold." It would be more meaningful to express this the other way round: "The MCRS must allow an administrator to add disposal holds to records and aggregations." Concomitant changes needed to subsequent requirements.

R1.13.5: "The MCRS must allow an administrator to add aggregations and records to a disposal hold." As presently worded, this does not explicitly state that an unlimited number of disposal holds can apply to any aggregation or record; this must be made clear.

## MoReq2010 - Draft - 1 Core (section 1.12) Disposing of records (27/11/10 to 26/12/10)

Comment by	Mr Marc Fresko
Comment ID	dc1-12_13
Response Date	22/12/10 23:43
Consultation Point	Proposal R1.12.46 to R1.12.59 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1

Comment on draft

### MAJOR COMMENTS

R1.12.58: Change "read" to "use" (you cannot prevent the system from "reading" anything).

**R1.12.58 makes sense, but has the effect that administrators MAY not be able to relate the newly-imported schedules to the schedules in the list or system from which they originated (as the schedule Title is not necessarily unique). Therefore should there be a requirement to allow them to be related somehow, in a way that is easily inspected?**

### TYPOS, GRAMMAR ETC.

R1.12.48: "... add a textual [...] comment..." Delete word "textual". **This applies throughout the specification.**

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Comment by	Mr Marc Fresko
Comment ID	dc1-12_14
Response Date	22/12/10 23:43
Consultation Point	Proposal R1.12.31 to R1.12.45 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1

Comment on draft

### MAJOR COMMENTS

R1.12.32: the phrase "[Either] whenever their metadata changes" does not make sense (what is the "their"?). Please review.

R1.12.45: Is it intentional that "last" review comments - should there be more than one - get automatically deleted? Wouldn't reviewers want to see what previous reviewers commented? Are the comments preserved and accessible in history metadata, or lost irretrievably?

### MINOR COMMENTS

R1.12.45: Would be simpler to express this as: "When an administrator completes a review by applying a disposal schedule to a record under R1.12.42 the MCRS must delete any previous last review comment and allow the administrator to add a new last review comment to the metadata of the record".

### TYPOS, GRAMMAR ETC.

R1.12.34: Change "elapsed" to "been reached" in both occurrences (a date cannot elapse).

R1.12.35: Change "elapsed" to "been reached".

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-12_15
<b>Response Date</b>	22/12/10 23:44
<b>Consultation Point</b>	Proposal R1.12.16 to R1.12.30 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
	Comment on draft

### MAJOR COMMENTS

R1.12.28: Refers to a metadata element "retention date". There is no such element in 1.26. I imagine this is intended to refer to a date as calculated using a combination of elements M1.26.72 and M1.26.73, but I've no way to be sure. **This is a small example of a bigger problem, which is that it is impossible to review the metadata model properly, or to include in the review of requirements the metadata implications, without links and more explanation of the metadata.**

### MINOR COMMENTS

R1.12.20: allows a retention schedule to be modified only if it has not been applied. Should this perhaps instead be only if its trigger event has never been reached (regardless of whether it has been applied)?

R1.12.22 comment paragraph 1: tighten the language to avoid possible confusion between "active/inactive" and "apply/remove". Also remove "applying" which just obscures further.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-12_16
<b>Response Date</b>	22/12/10 23:44

<b>Consultation Point</b>	Proposal R1.12.1 to R1.12.15 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

### MAJOR COMMENTS

Lists of metadata element values, such as the lists in R1.12.4, R1.12.8 and elsewhere should be in the metadata model, not in the requirements. The requirements (if you disagree, then for consistency I fear you will have to incorporate, for example, the list of language codes in the requirements that refer to them, not just the reference to the list).

R1.12.7: Is this sufficient? Should not this (or preferably the data model) specify which datatypes are to be used for which trigger values, for interoperability?

### MINOR COMMENTS

R1.12.2: I suspect that some might object to all schedules being browsable without limitation by all users. Maybe add a comment that while an MCRS must meet this requirement, there is nothing to prevent it additionally implementing features that can limit such access? Or else face the fact that some users have valid reasons to customise model specifications.

R1.12.8 and R1.12.9: together specify an interval (e.g. DAYS, MONTHS) and a duration (e.g. 3, 7). This is unnecessarily complex for metadata. All the metadata needs to do is to specify the duration in some standard form (e.g. a number of days). The user interface may well separate the interval and the duration, but the metadata does not have to.

R1.12.10: It would be desirable to explain the rationale for setting a 100-year limit, which otherwise might appear arbitrary.

## MoReq2010 - Draft - 1 Core (section 1.11) Metadata and templates (26/11/10 to 26/12/10)

<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-11_14
<b>Response Date</b>	22/12/10 23:46
<b>Consultation Point</b>	Proposal R1.11.31 to R1.11.45 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

### MAJOR COMMENTS

R1.11.33: Move the limitation about supplied elements from the comment to the body of the requirement (consistent with earlier comments).

### MINOR COMMENTS

R1.11.31 (and elsewhere): refers to "an element definition created under R1.11.13". Would it be clearer (for readers) and easier to maintain (for the DLM Forum) to instead define a new term, something like "a custom metadata element"?

### TYPOS, GRAMMAR ETC.

R1.11.42: In the comment, "also" does not make sense, and "the MCRS may also come with..." is informal. Suggest instead "The MCRS supplier may provide templates, consistent with R1.11.43."

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-11_15
<b>Response Date</b>	22/12/10 23:46
<b>Consultation Point</b>	Proposal R1.11.16 to R1.11.30 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

## MAJOR COMMENTS

**R1.11.16: The second paragraph of the comment is extremely important. It probably warrants greater visibility than it has here as a comment. I think the best would be to promote it to 1.4.10.**

R1.11.20/R1.11.21: Consider combining these into a single requirement.

R1.11.21: At a guess, you intend that this uses the metadata element R1.26.56 (a guess as it is not specified anywhere in this draft). At a guess, you intend it should have a datatype of "integer" or "nonNegativeInteger" (a guess only, for the same reason). I don't think either of these support a value of "unlimited". So how would it be implemented?

**R1.11.24: The third paragraph of the comment " *This requirement does not apply to the MoReq2010 supplied element definitions...* " is absolutely crucial to the requirement. It is much too important to be buried away at the end of a comment. move this specific exclusion into the body of the requirement.**

**R1.11.25: Move the substance of the comment clause " *Only element definitions created under R1.11.13*" to the body of the requirement (same reason as comment to R11.24).**

## MINOR COMMENTS

R1.11.16: Language is unnecessarily complex. Simplify as R1.11.15.

R1.11.16: "*Note that a possible extension module to MoReq2010 to include metadata element definitions based on XML complex types has been proposed.*" I am not clear what the 3rd paragraph of the comment means or why I need to "note" it, like many (most?) readers.

R1.11.22: Clarify "automatically map".

## TYPOS, GRAMMAR ETC.

R1.11.22 comment: consider replacing "special" with "custom" (or else define "special").

R1.11.23 comment: delete word "supported" (because there is nothing to stop someone using an "unsupported" language (whatever that might be - Klingon perhaps?))

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-11_16
<b>Response Date</b>	22/12/10 23:48
<b>Consultation Point</b>	Proposal R1.11.1 to R1.11.15 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.2

Comment on draft

## ERRORS OF FACT

**R1.11.5: The comment is wrong. This specification requires a default single language even in multilingual countries. Some countries and regions in Europe are multilingual. It is not correct to assume that " *Textual metadata input directly into the MCRS may therefore be assumed to be in the default language* " in a multilingual country. This is a fairly substantial problem that needs to be corrected in a specification that is intended from the outset to be European.**

## MAJOR COMMENTS

R1.11.2: Add a reference to the table in 1.23 - greatly aids understanding.

R1.11.3: Why is a language mandatory? This is not a core requirement for records management. The scope of the present specification was meant to be core only.

R1.11.3, R1.11.5 and others: Why has the rfc/IANA route been followed in preference to ISO639 without any visible discussion? What are the implications (for users, and for backwards compatibility?) Need to add clarifying comments.

R1.11.4: Why has the Unicode standard been chosen in preference to ISO 10646, without any visible discussion?

**R1.11.4: It is not appropriate to say here " *The latest version of the [...] Standard is 6.0* ". The statement may become untrue after (or even before) this version of MoReq is published - and if it were appropriate, consistency would dictate that you reference all other standards similarly. What would be correct is to specify which version of each standard is mandated by MoReq. When a standard is updated, the MGB should then review it to decide whether it should be adopted, and then issue a new version of the core or module, complete with new UUIDs of course.**

R1.11.8: Delete words "highly accurate" as they are meaningless if not quantified. Note that R1.11.9 specifies the necessary level of accuracy anyway.

R1.11.6: Explain whether the time adjustments (Summer Time etc.) can be done by administrators (it is not clear as the language says the system "must be able to adjust").

R1.11.7: This requirement is too vague. No vendor can fail this requirement as it is worded. To be meaningful it would have to be expanded to show what the functional requirements of multiple time zones are. **But that would not be appropriate as it falls well outside of core records management, so just delete this requirement.**

R1.11.10: The 2nd paragraph of the comment is not a comment, it is two requirements so should be converted to this form.

## MINOR COMMENTS

R1.11.1: delete the comment about how spiffy and fast UUID algorithms are - it is irrelevant.

R1.11.9: Clarify that the format for time zone is provided in the W3C standard.

R1.11.15: "Where an administrator has nominated that a new element definition will hold a reference to an entity under R1.11.14, the MCRS must ensure that the administrator further specifies by nominating from the entity type inventory, which entity type or types the element will reference." The language is tortuous (and, I think, incomplete). Consider simplifying to something like "Where an element definition will hold a reference to an entity under R1.11.14, the MCRS must ensure that the administrator specifies **the entity type or types** ". Language referring to the administrator nominating, and the inventory, is unnecessary.

## TYPOS, GRAMMAR ETC.

R1.11.9 "replace "populates" with "populate".

## MoReq2010 - Draft - 1 Core (section 1.10) Records and components (26/11/10 to 26/12/10)

Comment by	Mr Marc Fresko
Comment ID	dc1-10_16
Response Date	22/12/10 23:52
Consultation Point	Proposal R1.10.1 to R1.10.15 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1

Comment on draft

### ERRORS OF FACT

R1.101.11: "*If the component cannot be searched using full text searching then a user will only be able to find it based on searching its metadata.*" Not so. Increasingly, search engines that can search on **image content** are being developed; and some mainstream video-processing applications support (for example) searching for **scene transitions**. Just delete the sentence, it adds nothing important anyway.

### MAJOR COMMENTS

**R1.10.1: Uses "create" where previous specifications have used "capture". This confuses unnecessarily - but if there is a persuasive reason, add it. But otherwise, consider reverting to "capture"; the problem with "create" is that people know full well they can "create" a record merely by writing a letter, or sending an email, etc.; it clearly and definitely is already a record and therefore has already been "created", it does not need to be placed under the management of the MCRS to become "created" as a record. What the act of placing it under MCRS management and adding metadata (i.e. "capture") does is only to make it a properly-managed record.**

R1.10.1. See earlier comment about the need to explain the rationale for the exclusion concerning aggregations.

**R1.10.9 (and elsewhere): Now I am confused. This uses both "capture" and "declare", whereas previous references have been to "create". It may be that you intentionally use "capture" and "declare" for components and "create" for records, but this is unclear (and the implications even less so). This badly needs attention.**

R1.10.9 consists of two unrelated requirements and should be split accordingly.

R1.10.11 & 12: the requirements to identify automatically what components are and are not natural language, and further to identify the language in question, are hardly core to records management. As they will be demanding for vendors, consider removing them (somehow systems seem to manage without them today).

### MINOR COMMENTS

R1.10.5: "When a new record is created under R1.10.1 the MCRS must allow the user to choose any class as the record's primary classification including classes added under R1.10.3, if the nominated class has a disposal schedule associated with it" The wording seems to imply that you can assign a

bunch of classes without making one primary, then choose to make one primary. I doubt that was your intention (as it would allow a valid state with no primary classification).

r1.10.14: "*The location may be in another business system.*" In order not to be discriminatory, consider changing to "*The location may be in another business system or may be a physical storage location*".

R1.10.5 and elsewhere: "When a new record is created..." Delete "new" as it is superfluous (and its presence implies that it would be acceptable to create an "old" record).

R1.10.15: Consider replacing the verb "delete" with "destroy" (because it is difficult to delete paper).

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-10_17
<b>Response Date</b>	22/12/10 23:54
<b>Consultation Point</b>	Proposal R1.10.31 to R1.10.41 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
	Comment on draft

#### MAJOR COMMENTS

R10.33: Consider adding a comment to clarify that the idea of "cloning" is intended to be transparent to the user; the user must not have to explicitly clone a record. Also mention that this usage of "clone" in records management is not in common usage.

#### MINOR COMMENTS

R1.10.34: "*...the event history must not be duplicated but instead the clone must be added to each existing event in the original event history as a participating entity...*" This has the effect of retrospectively creating entity history metadata. Is that OK?

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-10_18
<b>Response Date</b>	22/12/10 23:54
<b>Consultation Point</b>	Proposal R1.10.16 to R1.10.30 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
	Comment on draft

## MAJOR COMMENTS

R1.10.23: "If a user is able to inspect..." does not make sense because R1.10.22 states "...must allow a user to inspect..." Likewise R1.24 and R.1.22.

R1.10.27: "The MCRS must allow a user to change the values of any metadata elements associated with a record..." This seems to allow users to change system-generated metadata and entity history metadata, which I doubt you intend. Please revise.

## MINOR COMMENTS

R10.18: Incorrect reference. Needs to refer to R1.10.8, not R1.10.16.

R1.10.19: delete word "accurately" (because doing it inaccurately ain't an option).

R1.10.23: "download" may not be the right verb, e.g. in a Citrix-style environment.

## TYPOS, GRAMMAR ETC.

R1.10.16: the final clause of the requirement "provided R.10.17) does not make sense as it is incomplete.

R1.10.17: Please review the wording - it is not normally possible to "remove" something "in" something, and I'm not sure about "adding" either. Possibly change to "the MCRS must ensure that its components cannot be added to, removed or replaced."

R1.10.18: Needs attention in two places:

- . "*The main component is the component that should be retrieved first by a user accessing the record...*" should be "*The main component is the component that **must be retrieved first when the record is accessed for a user...***"
- . "*by invoking the HTML document in a web browser it will automatically retrieve, access and include the other components*" should be "*invoking the HTML document in a web browser will automatically cause the other components to be retrieved.*"

R1.10.20 and 21: The grammar of the comments does not make sense.

## MoReq2010 - Draft - 1 Core (section 1.9) Aggregation (26/11/10 to 26/12/10)

<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-9_13
<b>Response Date</b>	22/12/10 23:55
<b>Consultation Point</b>	Proposal R1.9.31 to R1.9.42 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

### MAJOR COMMENTS

R1.9.35:I am not clear what “inactive” means in the context of an aggregation.If it is synonymous with “closed” (so “active means “open”) then use “closed” and avoid unnecessary new terminology. If not, it needs to be explained clearly (somewhere).

R1.9.35:There is something wrong with the structure of the comment.It boils down to “*Here is what closing means.Closing does not equal destroying it. Here is the only way of making it inactive*”. Please review.

R1.9.40:The requirement and comment about removing metadata but leaving it as history is saying the same (I think) s elsewhere, but in different words.Might it not be easier to give a global requirement that explains how the entity history metadata is meant to work?And/or perhaps include in the metadata definitions an attribute that defines how its history is to be handled?

### MINOR COMMENTS

R1.9.36:Do you really mean “simultaneously”?I doubt it, because that would make it a separate requirement.I think this should be using words about the MCRS “automatically and immediately” doing it...

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-9_14
<b>Response Date</b>	22/12/10 23:59
<b>Consultation Point</b>	Proposal R1.9.16 to R1.9.30 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

### MAJOR COMMENTS

R1.9.24: please add a comment explaining the business need for this functionality.

## MINOR COMMENTS

R1.9.19: delete the final clause that starts with "if" as this requirement is covered elsewhere.

R1.9.20 & 22: The comment "...is replaced.....but remains..." is unclear. Please clarify.

## TYPOS, GRAMMAR ETC.

R1.9.26: in the comment delete "*in its own parent aggregation to the original aggregation*" as this is superfluous.

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Comment by	Mr Marc Fresko
Comment ID	dc1-9_15
Response Date	23/12/10 00:00
Consultation Point	Proposal R1.9.1 to R1.9.15 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1
	Comment on draft

## MAJOR COMMENTS

R1.9.1. 'The MCRS must allow an administrator to create a new aggregation and add it to the MCRS without placing it into an existing aggregation.' I am not clear on what this is trying to say. Is it 'The MCRS must allow an administrator to create **exactly one** new aggregation and add it to the MCRS without placing it into an existing aggregation'?

Actually it would be simpler to delete R1.9.1 and just rely on R1.9.2, supplemented by text explaining that the very first aggregation is a special case. But it's a matter of style.

R1.9.3: What is the effect of the phrase 'When a new aggregation is created'? does this mean it has to be done as part of the 'create' function? can only be done at time of creation? can be done at time of creation or later? Needs clarification.

R1.9.5: 'When creating a new aggregation under R1.9.1 or R1.9.2 the MCRS must allow an administrator to nominate which class associated with the new aggregation under R1.9.3 and R1.9.4 will be its primary classification, if the nominated class has a disposal schedule associated with it.' This is unnecessarily confusing. It relies on R1.9.1, R1.9.2, R1.9.3 and R1.9.4; but R1.9.3 and R1.9.4 in turn rely on R1.9.2; and R1.9.4 is incompatible with R1.9.1 (this sounds simple enough, but it took a lot of study to work it out). And anyway, it is about classifying, whereas the text implies it is about creating. Replace with: 'When classifying an aggregation under R1.9.3 or R1.9.4 the MCRS must allow an administrator to nominate which class associated with the new aggregation will be its primary classification.' Move the text about 'if the nominated class has a disposal schedule associated with it' to a comment (as it is redundant with other requirements that mandate this).

R1.9.6; Similarly, this needs to be changed from 'R1.9.1 or R1.9.2' to 'R1.9.3 or R1.9.4'.

R1.9.13: Except for system-generated metadata values (same comment as for classes, I think).

## MINOR COMMENTS

R1.9.7: '...the MCRS must ensure that valid values are provided by the administrator for these mandatory elements before the aggregation can be created' - I think to make sense this would have to mean a new definition of created, to mean something like a bunch of functions to do with creating and adding metadata values. Consider re-wording.

R1.9.15: 'Once applied to a higher level aggregation, classes will follow a rule of cascading inheritance.' This is not clear as it uses undefined terms (cascading, higher level). Replace with something like 'All classes applied to an aggregation are automatically immediately applied to all its child classes.'

R1.9.4: replace 'it is classified with' with 'with which it is classified'.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-9_16
<b>Response Date</b>	23/12/10 00:00
<b>Consultation Point</b>	Proposal R1.9.1 to R1.9.15 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

## MAJOR COMMENTS

R1.9.1. 'The MCRS must allow an administrator to create a new aggregation and add it to the MCRS without placing it into an existing aggregation.' I am not clear on what this is trying to say. Is it 'The MCRS must allow an administrator to create **exactly one** new aggregation and add it to the MCRS without placing it into an existing aggregation'?

Actually it would be simpler to delete R1.9.1 and just rely on R1.9.2, supplemented by text explaining that the very first aggregation is a special case. But it's a matter of style.

R1.9.3: What is the effect of the phrase 'When a new aggregation is created'? does this mean it has to be done as part of the 'create' function? can only be done at time of creation? can be done at time of creation or later? Needs clarification.

R1.9.5: 'When creating a new aggregation under R1.9.1 or R1.9.2 the MCRS must allow an administrator to nominate which class associated with the new aggregation under R1.9.3 and R1.9.4 will be its primary classification, if the nominated class has a disposal schedule associated with it.' This is unnecessarily confusing. It relies on R1.9.1, R1.9.2, R1.9.3 and R1.9.4; but R1.9.3 and R1.9.4 in turn rely on R1.9.2; and R1.9.4 is incompatible with R1.9.1 (this sounds simple enough, but it took a lot of study to work it out). And anyway, it is about classifying, whereas the text implies it is about creating. Replace with: 'When classifying an aggregation under R1.9.3 or R1.9.4 the MCRS must allow an administrator to nominate which class associated with the new aggregation will be its primary classification.' Move the text about 'if the nominated class has a disposal schedule associated with it' to a comment (as it is redundant with other requirements that mandate this).

R1.9.6; Similarly, this needs to be changed from 'R1.9.1 or R1.9.2' to 'R1.9.3 or R1.9.4'.

R1.9.13: Except for system-generated metadata values (same comment as for classes, I think).

## MINOR COMMENTS

R1.9.7: '...the MCRS must ensure that valid values are provided by the administrator for these mandatory elements before the aggregation can be created' - I think to make sense this would have to mean a

new definition of created, to mean something like a bunch of functions to do with creating and adding metadata values. Consider re-wording.

R1.9.15: *'Once applied to a higher level aggregation, classes will follow a rule of cascading inheritance.'* This is not clear as it uses undefined terms (cascading, higher level). Replace with something like *'All classes applied to an aggregation are automatically immediately applied to all its child classes.'*

R1.9.4: replace 'it is classified with' with 'with which it is classified'.

## MoReq2010 - Draft - 1 Core (section 1.8) Classification (26/11/10 to 26/12/10)

<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-8_11
<b>Response Date</b>	23/12/10 00:01
<b>Consultation Point</b>	Proposal R1.8.31 to R1.8.34 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

### MAJOR COMMENTS

R1.8.32: it is not logical to say that 'the metadata read from the datafile must be valid'. The data may or may not be valid. Possibly what you mean is 'the metadata read from the datafile must be validated'. It would be helpful to add a comment about the behaviour of the system in the event that validation fails.

### MINOR COMMENTS

R1.8.32: replace 'any mandatory elements' with 'all mandatory metadata elements'.

### TYPOS, GRAMMAR ETC.

R1.8.31, 32: replace 'datafile' with 'data'. (see my comment on R1.8.30)

R1.8.31: delete word 'given'.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-8_12
<b>Response Date</b>	23/12/10 00:02
<b>Consultation Point</b>	Proposal R1.8.16 to R1.8.30 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.3

Comment on draft

## MAJOR COMMENTS

R1.8.16: Add reference to where primary classification is explained (this is important as it is a concept new to MoReq2010).

R1.8.23: move the clause 'to allow it to be...' into a comment (it is not a requirement).

## TYPOS, GRAMMAR ETC.

R1.8.26 comment: add 'to' after 'similar'.

R1.8.30: replace 'reading from a datafile' by 'using data' (it could be a database not a datafile, and the user is not reading anything).

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-8_13
<b>Response Date</b>	23/12/10 00:04
<b>Consultation Point</b>	Proposal R1.8.1 to R1.8.15 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.2
	Comment on draft

## MINOR COMMENTS

R1.8.7: consider adding that "scope notes" are "descriptions" in metadata-speak (e.g. ISO 15836).

R1.8.11: 'The MCRS must allow an administrator to change the values of any metadata elements associated with a class...' Presumably the MCRS must **prevent** some system-generated values from being changed (for example M1.26.19, M1.26.20...) So maybe then this should be 'The MCRS must allow an administrator to change the values of any metadata elements associated with a class entered by a user...'

## MoReq2010 - Draft - 1 Core (section 1.7) Agents and roles (26/11/10 to 26/12/10)

Comment by	Mr Marc Fresko
Comment ID	dc1-7_8
Response Date	23/12/10 00:07
Consultation Point	Proposal R1.7.1 to R1.7.15 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.3

Comment on draft

### MAJOR COMMENTS

#### R1.7.5: Shouldn't there be some qualification here about users' access permissions?

R1.7.6 (and elsewhere): the cross reference to another requirement for a terminological definition is unhelpful; such references should always be to the glossary.

### MINOR COMMENTS

R1.7.7: I suspect there is an exception here, namely when the MCRS has imported user entities from some other MCRS and one or more of them have not previously used the (importing) system. If that is correct, then the comment to this requirement is accurate but the requirement itself needs a tweak.

R1.7.9: mandates an external identifier, without making clear what should happen if the authentication and directory service is internal to the MCRS. Clarify?

R1.7.10: consider adding to the comment "... *but does not prevent this*".

R1.7.15: the comment is superfluous and can be deleted.

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Comment by	Mr Marc Fresko
Comment ID	dc1-7_9
Response Date	23/12/10 00:09
Consultation Point	Proposal R1.7.31 to R1.7.43 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1

Comment on draft

## MAJOR COMMENTS

1.7.35: same comment as 1.7.24.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-7_10
<b>Response Date</b>	23/12/10 00:10
<b>Consultation Point</b>	Proposal R1.7.16 to R1.7.30 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

## MAJOR COMMENTS

R1.7.24: This is needed, as stated, only when a user is unintentionally deleted then reinstated with a different user account. However, I think it will have the effect of creating in the MCRS a new User entity. This will lead to confusion in the event history. Would it be possible instead to re-activate the unintentionally-deactivated user entity (which, according to R1.7.23 must still exist and be inactive) and link it to the new directory service record?

R1.7.25: 'If, during user synchronisation with the directory service, the MCRS discovers a group for which it does not already have a corresponding group entity, then it must create a new active group entity for that group in the agent inventory.' This seems to be relying on the uniqueness of group titles. especially over the long term, and especially with large organisations that see mergers, reorganisations, divestments, renamings and so on, that is not a good bet. Would it be better to say 'If, during user synchronisation with the directory service, the MCRS discovers a group for which it does not already have a corresponding active group entity, then it must create a new active group entity for that group in the agent inventory.' - and would this suffice? I suspect there is a bit of a minefield here.

R1.7.27: For each new group, the MCRS must automatically retrieve the group's name from the directory service and set it to the title of the group entity.' Isn't this the wrong way around? Shouldn't it be something like: 'The MCRS must automatically store the name of the group, as retrieved from the directory service, for each group as the title of its group entity.' (note this is both the right way round, and also consistent with R1.7.26). Arguably, this requirement is superfluous in the light of R1.7.31.

R1.7.21, R1.7.32 (and perhaps others, I have not checked): This is about recording synchronisations in the entity histories as timestamps. It seems to say that **all** synchronisations have to be recorded if an external directory service is used, but (in the comment)**only the most recent** if an integrated directory service is used. I'm not clear why there is this difference. I should have thought the level of event recording should be identical. If there is a strong reason, perhaps it could be clarified?

## MINOR COMMENTS

R1.7.16: the requirement that some MCRS "should set [a default value]" is not permissible in a comment. It would be clearer (for the reader) if R1.7.16 were moved after R.1.7.17.

R1.7.29: the grammar is the wrong way around - the group entity does not synchronise anything, it gets synchronised.



## MoReq2010 - Draft - 1 Core (section 1.6) Performing functions (25/11/10 to 26/12/10)

Comment by	Mr Marc Fresko
Comment ID	dc1-6_13
Response Date	23/12/10 00:12
Consultation Point	Proposal R1.6.31 to R1.6.37 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1

Comment on draft

### MINOR COMMENTS

R1.6.32 and 33: much as an earlier comment about "activate", simplify and combine these 2 requirements into one requirement that allows an administrator to change at any time whether the metadata is or is not deleted.

R1.6.34: move to near R1.6.24 et al.

### TYPOS, GRAMMAR ETC.

R1.6.32: In the phrase "...each function definition within the function inventory..." delete the words "within the function inventory", as they are superfluous. **Note** that similar changes should be made to several other references to functions.

R1.6.32: delete the word "either".

R1.6.32: delete the words "*It should be noted that*".

R1.6.36: replace "users" with "a user".

R1.6.37: replace "the entity" with "an entity" and add a qualification about the user's access permissions.

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Comment by	Mr Marc Fresko
Comment ID	dc1-6_14
Response Date	23/12/10 00:13
Consultation Point	Proposal R1.6.16 to R1.6.30 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1

Comment on draft

## MINOR COMMENTS

R1.6.16: The comment that users "*must not receive separate feedback individually for each participating entity*" is probably not what was intended. It probably should be something more like "*feedback to users must not be limited to separate feedback about each selected entity*" (note the removal of "participating", which is not defined, in favour of "selected" to be consistent with the explanation of bulk operations - **similar changes may need to be effected elsewhere**).

R1.6.22 to R1.6.24 and R1.6.26: there is a simpler and clearer way to express these 4 requirements, namely something like: 'The MCRS must allow the administrator to specify at any time that any function does, or does not, create event history metadata for the entity or entities on which it acts; the sole exception being that the function for modifying functions in this way must always create entity history metadata for the affected function(s)' (note this avoids the use of the undefined word 'reset').

R.1.6.24: it would be helpful to expand this comment to explain that this is essential for auditability.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-6_15
<b>Response Date</b>	23/12/10 00:13
<b>Consultation Point</b>	Proposal R1.6.1 to R1.6.15 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
	Comment on draft

## MAJOR COMMENTS

R1.6.7: '... the MCRS must provide a means by which a user can interrogate the system and retrieve extended error information...' It is not clear what this means with module 102. A strict interpretation would be that some other software system (the "user" in the context of module 102) can interrogate the MCRS - but that does not sound reasonable. Maybe it means that there must be an API to support such interrogation - but such an API would not be any use without a custom program to allow the user to access it, which is contrary to what module 102 intends. Whatever, it needs clarification. **I think this problem applies to several requirements.**

## MINOR COMMENTS

R1.6.1 is not testable.

R1.6.5 and R1.6.8: 'If the MCRS fails to complete a function performed by ...' should be 'If the MCRS fails to complete a function initiated by ...'

R1.6.10: '*Each separate function within the bulk operation must be performed as a self-contained function, as specified in R1.6.1*' should be (something like) '*The function must be performed separately for each entity selected for the bulk operation.*'

R.1.6.11: will be testable only if a database is intentionally corrupted. Is this allowable?

**TYPOS, GRAMMAR ETC.**

R1.6.1: 2nd sentence does not make sense.

R1.6.8: the grammar of the comment needs attention.

R1.6.15: the ideas of the MCRS "ending an operation "as soon as possible" and of "deciding" something are both informal and so inappropriate for this context. Express more clearly.

## MoReq2010 - Draft - 1 Core (section 1.5) Records systems (25/11/10 to 26/12/10)

<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-5_16
<b>Response Date</b>	23/12/10 00:16
<b>Consultation Point</b>	Proposal R1.5.31 to R1.5.45 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

### MAJOR COMMENTS

R1.5.31 to R1.5.41: These requirements could be expressed more compactly, making them easier to follow and making the section shorter. The way to do this would be to make them consistent with R1.5.42, which expresses one requirement for both auctioning and recalling. So, for these requirements: you first have one requirement that allows administrators to action or recall; then a series of requirements that each apply to both action and recall.

R1.5.x: The vocabulary could be simplified. The essence is to base everything on the word "active". Then instead of "action" and "recall" (neither of which is closely related to "active") and "make an inactive alert active", use "de-activate" and "re-activate" consistently throughout.

### MINOR COMMENTS

R1.5.43: 'A "bulk operation" is a function performed simultaneously on a selected number of entities of the same entity type in a single operation' should be 'A "bulk operation" is a function performed simultaneously on a selected number of instances of the same entity type in a single operation'.

R1.5.44 is unnecessary - this requirement is in R1.5.43.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-5_17
<b>Response Date</b>	23/12/10 00:17
<b>Consultation Point</b>	Proposal R1.5.16 to R1.5.30 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

## MAJOR COMMENTS

R1.5.29: What about administrators who are 'directly accessing the system'? Consider adding a requirement to alert them too.

## MINOR COMMENTS

R1.5.24: delete, not needed because R.1.5.23 already specifies this.

R.1.5.29: change 'twitter.com' to 'microblogging service'.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-5_18
<b>Response Date</b>	23/12/10 00:19
<b>Consultation Point</b>	Proposal R1.5.1 to R1.5.15 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

## MAJOR COMMENTS

R.1.5.2 specifies that MCRSs are monolingual. Surely this is **completely unacceptable in Europe?**

## MINOR COMMENTS

R1.5.1: delete reference to 1.5.19 - it is not helpful, as 1.5.19 does not express anything that is not already in R1.5.1.

R1.5.1: change 1.11.1 and 1.11.2 to R1.11.1 and R1.11.2 respectively.

R.1.5.2: 'assign to itself' implies an implementation method. What this should say is that the MCRS must have a default language when it is installed - there are other ways in which this can happen (it is clearer in the commentary).

R.1.5.2: '*The core requirements of MoReq2010 do not make provision for...*' Yes, but do they permit it? Clarify.

R.1.5.11: 'at a particular site for a particular location': some systems are distributed at many sites, some may serve several organisations.

R.1.5.11: '*A full list of all MoReq2010 certified MCRS products [...] will be published on the DLM Forum website*' should be '*A full list of all MoReq2010 certified MCRS products [...] is published on the DLM Forum website*'.

R1.5.12: Should 'report header' be 'report'? If not, clarify 'header'.

R1.5.12: The reference to 1.14.42 (presumably meant to be R.1.14.42) seems to be wrong. R1.14.42 contains nothing that clarifies R.1.5.12.

R1.5.12: The reference to 1.15.6 (presumably meant to be R.1.14.42) seems to be wrong. R1.15.6 contains nothing that contains nothing that clarifies R.1.5.12.

R.1.5.14: *'For example, here it is used to define who may browse the entity type definitions in the MCRS, in this case, users, meaning both users and administrators.'* This sentence does not seem to relate to the rest of the comment from which it is taken.

R.1.5.15: replace 'an entity type definition' with 'all entity type definitions'.

## MoReq2010 - Draft - 1 Core (section 1.4) Key concepts (25/11/10 to 26/12/10)

Comment by	Mr Marc Fresko
Comment ID	dc1-4_56
Response Date	23/12/10 00:21
Consultation Point	Proposal 1.4.15 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1

Comment on draft

### MAJOR COMMENTS

Paragraph 2: "In MoReq2010, non-functional requirements differ from functional requirements by taking the form of questions." **This does not make sense**, because a question is not a requirement. The objective of "model requirements" (MoReq) is to present requirements in a "model" form. **The questions in sections 1.16, 1.17 and 1.18 do not achieve the objective. They need to be comprehensively rewritten.**

Paragraph 2: " These are questions that should be asked by the organisation ..." No. Some will be relevant to some organisations. None "should" be asked by all.

### TYPOS, GRAMMAR ETC.

Paragraph 2: "In part these questions may be able to be answered..." Not really - questions do not have any such ability.

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Comment by	Mr Marc Fresko
Comment ID	dc1-4_57
Response Date	23/12/10 00:22
Consultation Point	Proposal 1.4.14 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.2

Comment on draft

### MINOR COMMENTS

'Import is provided as an extension module...' change to 'Import maybe provided as an extension module in the future...'

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-4_58
<b>Response Date</b>	23/12/10 00:23
<b>Consultation Point</b>	Proposal 1.4.12 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

#### **ERRORS OF FACT**

'all jurisdictions' is unlikely to be correct. I suggest 'many jurisdictions'.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-4_59
<b>Response Date</b>	23/12/10 00:23
<b>Consultation Point</b>	Proposal 1.4.11 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

#### **ERRORS OF FACT**

'Note that the ability to give a record a primary classification that is different to the primary classification of its parent aggregation replaces the concept of record types in previous versions of the specification.' This is not correct. The two concepts are not equivalent, and the effect of replacing a retention rule in the way proposed in this draft is very different to the effect of applying a second, potentially conflicting, retention rule using a 'record type'.

#### **MAJOR COMMENTS**

**Disposal schedules see to allow for a "retention period" and a "disposal period" (in 1.12). It is essential that this new idea be explained here in 1.4.1;** The only explanation I can find is a single sentence in the comment to a requirement and it took me ages to find it.

'...records are given disposal schedules which they may derive from their primary classification'. Should 'may' be 'must' because a primary classification is mandatory? if not, then this needs to be clarified.

Clarify the position regarding records that are retained indefinitely or forever (as allowed by R1.12.4 & R1.12.5). Clarify in both text and diagram, neither of which explicitly show this possibility (though both could be taken to allow it).

## MINOR COMMENTS

paragraph 1: "The creation of disposal schedules [...] is discussed in section 1.12..." No, it is not. It is specified. And its not just their creation either. So replace with something more like "The creation and use of disposal schedules [...] is specified in section 1.12..."

replace 'in previous versions of the specification' with 'in MoReq2'.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-4_60
<b>Response Date</b>	23/12/10 00:24
<b>Consultation Point</b>	Proposal 1.4.10 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
	Comment on draft

## MAJOR COMMENTS

I think (there is no way to check) that this is the first usage of "template". Please add a brief explanation here of what is meant in MoReq2010 by template.

I'm not clear about the idea that only suppliers can provide component templates; it seems to me that different suppliers might provide completely different templates for the same datafile format. This would demolish interoperability. Do we need some sort of meta-template to be used by suppliers? Or do we need at least a minimum component metadata set?

Exactly the same comment applies to user templates.

The draft requires that datatypes are defined in 'W3C XML Schema Definition Language (XSD) 1.1 Part 2: Datatypes'. This is a **draft** that has not been adopted (so far as I can see). It contains the text 'This is a draft document and may be updated, replaced or obsoleted by other documents at any time. It is inappropriate to cite this document as other than work in progress.' Why is it appropriate to cite this as a basis for all the records created by MCRSs? Should the W3C recommendation, version 1.0, be used instead? Despite being 6 years old, version 1.0 defines the same datatypes as version 1.1, just less rigorously (I think).

## MINOR COMMENTS

'Administrators can construct templates, consisting of sets of custom element definitions' - should this be 'Administrators can construct templates, consisting of any combination of standard and custom element definitions'? (note removal of undefined 'sets' as well as addition of 'standard').

#### **TYPOS, GRAMMAR ETC.**

Paragraph 3: need to tighten the language. Specifically, this paragraph uses 'document format' and 'data format' when it should use 'datafile format', 'document' when it should use 'component'....

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-4_61
<b>Response Date</b>	23/12/10 00:25
<b>Consultation Point</b>	Proposal 1.4.9 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
	Comment on draft

#### **MINOR COMMENTS**

'it is unlikely that any centralised MCRS with its own separate repository will recognise and be able to render more than a handful of the most commonly used document types'. My recollection is that most EDRMSs render a few hundred formats, often by using an integrated 'viewer'.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-4_62
<b>Response Date</b>	23/12/10 00:26
<b>Consultation Point</b>	Proposal 1.4.8 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
	Comment on draft

#### **MAJOR COMMENTS**

**Paragraph 2: the rule against mixing records and aggregations in the same aggregation has proved to be extremely contentious in the past. I tend to favour it, but there is no clear reason**

**- it just seems to represent better practice and better 'structure'. It would save a lot of later argument and debate if this could be explained here.**

There is no need to specify 'at least' 7 levels of aggregation. That many levels are not needed by many organisations. I understand the widely-accepted minimum is 3. Anyway, this is a requirement that should be in section 1.8.

#### **MINOR COMMENTS**

##### **TYPOS, GRAMMAR ETC.**

'orthogonal concepts' - replace with simpler words.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-4_63
<b>Response Date</b>	23/12/10 00:28
<b>Consultation Point</b>	Proposal 1.4.6 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

#### **MAJOR COMMENTS**

The view that agents are 'outside an organisation' is contrary to ISO 23081; see Part 2 Figure 1.

##### **TYPOS, GRAMMAR ETC.**

I don't understand the phrase 'style event history'.

paragraph 4 refers to a 'rich metadata context'. Richness is not an objective - completeness is.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-4_64
<b>Response Date</b>	23/12/10 00:29
<b>Consultation Point</b>	Proposal 1.4.5 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Comment on draft

## MAJOR COMMENTS

The proposed approach using entity history metadata instead of audit trails allows the history of records and aggregations to be searched. But I cannot see how to search for what a user has done. This may be my error, but if it is an omission from the draft it needs to be added.

## TYPOS, GRAMMAR ETC.

paragraph 3: 'the MRCS' should be 'an MCRS'.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-4_65
<b>Response Date</b>	23/12/10 00:30
<b>Consultation Point</b>	Proposal 1.4.4 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
	Comment on draft

## MAJOR COMMENTS

'This allows every record ...to be traced back to the very instance in which it was created'. **I don't think this is correct. I think it would be correct IF (a) there is a registry of MCRS instances, AND (b) the instance identifier is mandatory metadata for each exported record (which it does not seem to be in this draft).** If this is correct, the simple fix is to replace this sentence with a more realistic explanation of the level of traceability UUIDs will bring to records. The more challenging fix is to work out the extent to which this is all worth doing given the small extent of traceability that is likely to result.

## TYPOS, GRAMMAR ETC.

'MoReq2010 does not define these modules as "optional" as they may not be optinoal' - this phrase is confusing and needs to be re-drafted.

Penultimate paragraph: word "they" is unclear.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-4_66
<b>Response Date</b>	23/12/10 00:31
<b>Consultation Point</b>	Proposal 1.4.2 ( <a href="#">View</a> )
<b>Status</b>	Draft

<b>Submission Type</b>	Web
<b>Version</b>	0.1
	Comment on draft

### MAJOR COMMENTS

Need to provide here (the first mention of UUIDs) a reference to the formal definition of UUIDs.

The idea that each version of each function, requirement, metadata element and so on has a UUID can lead to clarity and traceability is sound - however, it will work only if implemented in a way that is usable. The present draft does not give any indication of how the links between entities will be implemented, how easy they will be to use, how an entity can be searched for, how it would be maintained, and so on. In effect, this means consultees are being asked to sign off something they have not seen. The team should publish as an integral part of this consultation a demonstrator, proof of concept, or similar. Without this, it would be crazy for the DLM Forum Executive to approve this approach.

In paragraph 3, need to clarify what the core "module(s)" is(are). Is everything from 1.5 to 1.18 one module, or is that 14 modules?

### MINOR COMMENTS

"a system that is compliant with version 1.3 of a module will not be compatible with version 2.0 of the same module". Is this necessarily correct? I think that a more correct statement would be "a system that is compliant with version 1.3 of a module may or may not comply with version 2.0 of the same module, and may even not be compatible with it".

It would be helpful to explain which kinds of UUID can be used or are preferred (even if this is not essential).

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-4_67
<b>Response Date</b>	23/12/10 00:32
<b>Consultation Point</b>	Proposal 1.4.1 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
	Comment on draft

### ERRORS OF FACT

1.4.1: It is not correct that modularity is a new concept in MoReq2010. MoReq2 featured modules. Probably the best way to correct this is to highlight the innovation which is a complex series of independent but "module extension series", some of which are mandatory and some optional, and

some of which contain more than extension modules which may be compatible. Well, something like that.

#### **MAJOR COMMENTS**

**Need to describe in this section what is meant by "core requirements", and that the core requirements excludes the extension modules even though at least three such modules are mandatory for a workable MCRS.**

## MoReq2010 - Draft - 1 Core (section 1.1 to 1.3) Important Information / Background / Purpose (25/11/10 to 26/12/10)

Comment by	Mr Marc Fresko
Comment ID	dc1-1_17
Response Date	23/12/10 00:33
Consultation Point	Proposal 1.3 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1
	Comment on draft

### MAJOR COMMENTS

1.3: remove reference to ISO 30300; as it is still emerging its contents are uncertain.

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Comment by	Mr Marc Fresko
Comment ID	dc1-1_18
Response Date	23/12/10 00:37
Consultation Point	Proposal 1.2 ( <a href="#">View</a> )
Status	Draft
Submission Type	Web
Version	0.1
	Comment on draft

### ERRORS OF FACT

1.2.4: "allowing immediate worldwide access to the latest version of the specification available from anywhere on the Internet" is **not** an innovation of MoReq2010. Both MoReq and MoReq2 were published first and primarily in electronic formats (several versions in the case of the latter) with the paper version following many months later.

1.2.4: The "level of collaboration" is **not** unprecedented. The number of people who so far have commented on m2010 is much less than the equivalent number for MoReq2 (about 40% I think); and the number of comments gathered is also much less than the 5,000 (approx) comments gathered for MoReq2. Even taking into account the fact that the consultation is still in progress, this is bound to remain the case.

1.2.4; "the core set of requirements is correspondingly reduced in comparison to MoReq2010's predecessors". **This is not true.** The present draft contains a minimum of 475 mandatory requirements, more than the 466 mandatory requirements in the core of MoReq2.

1.2.4: Refers to "now established programme of testing and certification of software products". The (anticipated) publication date is 31 Dec 2010. Will the DLM Forum really have agreed and published this programme so soon? I greatly doubt it. But if the DLM Forum has succeeded in doing so, please add a hyperlink to the documents that describe it (qualifications for testing authorities, procedure for applying to be a test authority, evaluation criteria, procedures for applying for tests, for issuing certificates and so on). If not, you need to **remove this text**.

## MAJOR COMMENTS

1.2: the language is self-serving and inappropriate for a requirements specification. A brief history is valuable, but needs to be written more formally.

1.2.3: delete the diagram. It was a useful visual aid in many presentations but has no place in this specification. It is vague (e.g. the list of modules in 2012) and aspirational rather than factual.

1.2.3: revise "The roadmap clearly identified..." It did no such thing. It is not the place of a roadmap to identify this, which is statements of opinion.

1.2.4: the idea that "testing and certification of software products against the specification negates the value of basing an implementation on MoReq but then going on to further modify and customise requirements" is quite simply wrong. The suggestion that the extension modules mean **no** customisation will ever be required is misguided. Admittedly, much of the vendor community may wish that was the case. But the truth is that while this may be correct for some user organisations, many other user organisations have, or perceive that they have, requirements that are unique or that are not adequately reflected in this early version of MoReq; these organisations have a valid reason to produce customised versions of MoReq2010 (and incidentally, it is a nonsense to try to stop them from doing so). The only sensible approach is to recognise this, and to provide mechanisms to make sure it can be done well, easily and sensibly (strongly advising minimum and clearly signposted changes for example); and to make very clear the potentially deleterious impact of customisation on the value of certifications. Anyway, the impact on the value of certification may often be lower than the impact of using a different system software configuration than was used for certification testing.

## TYPOS, GRAMMAR ETC.

1.2.4: "Experts'" should be "Experts" (i.e. remove superfluous apostrophe).

1.2.4: "allowing immediate worldwide access to the latest version of the specification available from anywhere on the Internet" does not make grammatical sense.

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<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc1-1_19
<b>Response Date</b>	23/12/10 00:38
<b>Consultation Point</b>	Proposal 1.1 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.4

Comment on draft

## OVERALL COMMENTS

First, some comments on the specification overall. I'm sorry to place these here, but I can find nowhere better (a request to the Project Manager for guidance on this point was ignored). At the end, some comments on section 1.1.

## OVERALL: IN SUMMARY

### 1. New ideas

MoReq2010 contains some new concepts - many ideas that are new to electronic records management. This makes it rather revolutionary, and certainly much more than the promised "refactoring" and "simplification" of MoReq2. These new ideas are much more in keeping with the digital age than the paper-based concepts of MoReq2. Novel ideas include (and this is just a selection):

- . Active and Inactive entities.
- . Abolition of separate audit trails.
- . Abandonment of some ISO standards and their replacement with other standards.
- . Monolingualism.
- . Primary and secondary classification.
- . The relationship between aggregation and classification.
- . What it means to "export" records.

However, some of these ideas - and several others I am not listing here - need careful discussion and consideration. They need care because of their nature, and because of some of the technical decisions taken to implement them (e.g. exactly how aggregations, classes and disposal schedules all work together). In effect, **this draft of MoReq2010 is asking us to accept a new records management paradigm**; and once it is chosen, it is intended to last "forever". Choosing a new long-lasting paradigm needs very, very careful consideration and very widespread consultation. I am concerned that the present consultation does not allow this. It is far too short for proper debate about these relatively revolutionary ideas.

### 2. Incompleteness

Some key things are missing from this draft. The most obvious omission is the relationships between entities. Without this, **it is impossible to sign off the draft with a clear conscience**.

Also missing is an understanding of file formats and their importance to long-term usability of electronic records - see below.

Also missing is the testing framework. Experience shows that developing this reveals many errors and inconsistencies - often minor ones, but not always. It therefore would be a mistake to sign off this draft before the test data is developed and reviewed.

### 3. Technical Flaws

There are two critical technical flaws. First, **module 102 will never work**. Second, the question of **datafile format metadata is ignored**. This draft takes as a starting point the idea that records can last through many generations of systems. This is a very valuable insight, and the world of records management is the better for it. But for records to remain usable, systems need to know the format of their components (ASCII Text, Word 10, PDF v1.6 and so on). There is no mention of this in the draft. This is admittedly a complex area, both technically and politically. Technically, MoReq2010 must adopt a controlled vocabulary of datafile formats, and to include datafile format identifier in the metadata of each and every component. Politically, this is sensitive because the best current vocabulary of this kind is English (the PRONOM registry) while there is no news about its long-hoped-for international successor, UDFR. Probably the least-risk option is to commit to PRONOM for now, with the intention of changing to UDFR later (it is hoped that UDFR will be consistent with or at least map to PRONOM for now, though we cannot be sure whether, when or how this will happen). Clearly this is an important issue, one that needs to be decided with care by the DLM Forum Executive. The present consultation does not allow for this.

#### 4. Vocabulary

For some reason(s?) the draft uses very little of the terminology established by ISO 15489, MoReq and MoReq2. Terms such as "retention and disposition schedule", "declare", "capture" and others have been discarded in favour of slightly different words, without explanation. This bears review.

#### 5. Quality

The quality of the draft is very good indeed in many ways. However, there are still many issues requiring resolution (hundreds in fact). Rushing through these resolutions will introduce a large risk of introducing errors. Also, the language needs "tightening" in many places (only a few of which I have been able to identify in dozens and dozens of comments), for example to remove unclear and undefined verbs. This is made worse because the project has clearly abandoned the idea of a final independent QA, something that is badly needed, and something that was promised as recently as last month. The only credible approach is to lengthen the project timetable to **allow for proper QA**.

#### 6. Conclusions and next steps

**For the reasons summarised above, I believe it would be a serious error to publish MoReq2010 Core as a finished specification in December 2010. Publish it by all means, but as some kind of next step, some sort of further consultation draft - but NOT as a finished specification. I strongly urge the DLM Forum Executive Committee to recognise the need for another round of detailed consultation (NOT just a four week period using a primitive portal).**

#### **OMISSIONS - MAJOR**

There should be a section that explains extension modules, specifically how one of 101/102 (etc) is essential.

There should be a section that explicitly points out the incompatibilities between MoReq2010-compliant systems and MoReq2-compliant systems, such as: aggregation/class, multiple retention and disposition schedules, audit trail, metadata, retention and disposition schedule structure, ...

It is impossible to review the metadata model properly, or to include in the review of requirements the metadata implications, without links and more explanation of the metadata. See for example comment on R1.12.28. Likewise Functions and Alerts cannot be reviewed. **In effect, this means the specification cannot be signed off.**

#### **OMISSIONS - MINOR**

There should be a section that reconciles MoReq2010 concepts to MoReq2, and explains briefly the key differences, strictly as an aid to understanding. For example: "aggregation (volume, sub-file, file, class)", "class" "class", "disposal disposition", "disposal schedule retention and disposition schedule" etc.

#### **OVERALL MAJOR COMMENTS**

The structure would be much easier to use, and would be **more extensible** if sections 1.1 to 1.28 were divided into five subdivided chapters, something like:

- . 1.1 to 1.4 Section 1 Introductory,
- . 1.5 to 1.15 Section 2 Functional Requirements,
- . 1.16 to 1.18 Section 3 NFRs,
- . 1.19 to 1.22 Appendices(or something like that),
- . 1.23 to 1.28 Section 4 Tables.

Only if this is done will it be possible to add (for example) new requirements sections without upsetting the section numbering.

The specification must state where it is not backwards compatible with MoReq2. For example: audit trails, system ids, handling of multiple retention schedules, language codes.

#### **OVERALL MINOR COMMENTS**

Many cross-references are wrong - the "R" prefix is missing from several references (e.g. reference to 1.11.2 in R1.5.1) (a good illustration of the need for independent QA).

#### **OVERALL TYPOS, GRAMMAR ETC.**

Remove passive tense constructions throughout. Using passive constructions in formal documents is deprecated. The phrase "It is hoped that" is a particular example, which is undesirable additionally because it is imprecise.

Remove the second person throughout (e.g. "...you read this section..." in 1.4.1) , replace with more consistent and formal language. Delete all occurrences of "Note that..." as the phrase does not add anything.

#### **SECTION 1.1 MINOR COMMENTS**

**1.1.5: consider a standard license for IPR, such as a Creative Commons licence. The present wording has the effect that any extract posted to Wikipedia is immediately taken down.**

**1.1.5: the requirement to seek permission before translating is nonsensical, unenforceable and undesirable. It is nonsensical as it limits dissemination and is incompatible with the IPR statement. Far better to replace with text strongly encouraging translators and prospective translators to inform or register with the MGB.**

#### **SECTION 1.1 TYPOS, GRAMMAR ETC.**

1.1.5: spurious word "to".

1.1.5: replace passive construction with active.

## MoReq2010 - Draft - 201 Hierarchical Classification (29/11/10 to 26/12/10)

<b>Comment by</b>	Mr Marc Fresko
<b>Comment ID</b>	dc201_13
<b>Response Date</b>	23/12/10 17:06
<b>Consultation Point</b>	Proposal 201.2 ( <a href="#">View</a> )
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### MAJOR COMMENTS

Paragraph 1: the mention of backwards compatibility is not necessary, given the manifold incompatibilities that are scattered throughout the draft specification.

Paragraph 4:“” **In order to assist this process** MoReq2010 allows only the lowest tier of hierarchical classification to be used in classification. Another way of expressing this is that parent classes cannot be used for classification of aggregations or records.”The highlighted words are not really true.Although many of us believe the restriction is a good idea, it is not “to assist the process”