

INCITS-V36/08-0029 Comments on LETSI Category A Liaison request

1. Affiliation: These comments are made on behalf of the members of the IMS Global Learning Consortium. The IMS GLC is an industry trade consortium that represents 115 member and subscriber organizations around the world. This includes 66 leading corporations, 27 leading institutions of learning, and 20 consortia and/or government organizations. IMS members include some of the largest users of SCORM in the world (such as KERIS) and many of the leading SCORM solution providers in the world. IMS GLC is a Category A Liaison with ISO/IEC JTC1 SC36 and also a member of the U.S. V36 TAG..

Summary: The IMS Global Learning Consortium strongly objects to establishment of a category A liaison relationship with LETSI at this time. IMS GLC believes that the following issues, all of which are addressable, must be addressed prior to support of LETSI as a category A liaison.

1. LETSI has literally no operational experience and has produced no standards or what are referred to as “reference models” in the organizing document. Therefore, it is unclear what value LETSI provides in the ISO/IEC standards forum. It could be appropriate to consider a Cat A liaison after LETSI has actually produced something and has had some operational experience.
2. While SCORM is termed a “reference model” by the U.S. DoD, it is not a reference model as the term is normally used in the standards industry. Normally, a reference model connotes a high-level framework under which standards or specifications can be developed, such as the OSI 7-layer protocol reference model. The SCORM use of the term “reference model” is a set of detailed specifications or standards. Regardless of the inclusion of the term reference model in the SCORM name, SCORM is widely referred to as a standard or set of specifications that enable interoperability (a simple Google search of sites that reference SCORM outside the DoD will verify this). Therefore, the entire premise of LETSI, also based on SCORM-like reference models, is inconsistent with the claim that LETSI will not produce standards or specifications. If LETSI actually were to produce what the standards industry normally refers to as reference models, IMS GLC could be supportive.
3. SCORM is an unauthorized derivative work of several IMS GLC specifications, including IMS Content Packaging and Simple Sequencing. IMS GLC has been attempting to resolve this issue with ADL for over two

years. The resolution is very straightforward and consists of ADL utilizing the normative industry practice of using IMS specifications by reference. However, ADL has refused to conform to standard practice and, as a result, is claiming a false copyright in the unauthorized work. IMS GLC has very little leverage to force the U.S DoD to comply with standard industry practice. IMS GLC would like to see ADL conform with the normative industry practice of incorporating the IMS GLC specifications by reference before IMS GLC can be supportive of any SCORM stewardship activity, whether performed by ADL or LETSI. Until this issue is resolved, IMS GLC believes that it would be inappropriate for ANSI or the U.S. TAG to support a category A liaison with an organization, LETSI, that claims to be a “steward” of an unauthorized derivative work in which false copyright claims are being made.

4. As stated in the organizing documents, the primary stated role of LETSI is stewardship of SCORM. However, LETSI has no legal claim to be the steward of SCORM. It is unclear what organization ‘owns’ SCORM, if any. In other words, it is a false and misleading premise that LETSI has any legal claim to being the steward of SCORM. This is true because of the derivative works issues discussed in the prior point, but also because of the funding source, U.S. taxpayer funds, for the ADL contributions to SCORM. LETSI and ADL representatives often refer to SCORM as a “public trust.” If this is true, it is inappropriate that any organization “own” its stewardship. IMS GLC believes it is inappropriate to form a category A liaison with an organization that falsely claims that it is the sole steward of SCORM.
5. LETSI is specifically encumbered by duplicative relationships with other bodies that already have liaison relationship with SC36. These include ADL (U.S. Department of Defense), IEEE, and AICC. The secretary of LETSI already represents ADL. His boss in Eduworks already represents IEEE. All three of the named organizations are named as LETSI founding sponsors, in addition to the IEEE Computer Society (also apparently represented by Eduworks). There appears to be a very significant overlap and duplication of liaison presence and activity with LETSI. In addition, IMS GLC members have a substantial interest in SCORM. Therefore, it appears that SCORM stewardship and LETSI’s interests are already represented, or even overrepresented, in the SC36 liaisons.

6. LETSI claims that it is an open organization. However, ADL and the founding executive committee explicitly excluded IMS GLC from the critical formation phase of LETSI (in which the general technical direction was set and IEEE ISTO was chosen as the legal entity), despite the fact that IMS GLC volunteered to get involved. This issue is currently the subject of a bid protest that IMS GLC has filed and is being reviewed by the U.S. GAO (General accounting Office). It is unclear if any resolution will come from this filing as it is an unusual case in which the GAO may not be able to rule. But, there is no disputing the facts. While in recent weeks LETSI has offered to include IMS GLC, there is a deep concern that LETSI sponsoring committee is over-weighted with the interests of the U.S. DoD. It is most likely too late to remedy directions already promoted by LETSI that IMS GLC feels are not in the best interest of global industry. IMS GLC believes that it is inappropriate to establish a category A liaison relationship with an organization that explicitly excluded the largest trade organization representing learning technology and SCORM. IMS GLC is hopeful that this exclusion could be corrected in the future, and at such time it might be appropriate to reconsider a Cat A liaison with LETSI.

IMS GLC believes that LETSI can resolve all of these issues, but this clearly will take some time. The suggestion of IMS GLC as a member of the U.S. V36 TAG is to reject the request for Category A Liaison at this time and reconsider it in the future after LETSI has had some operational history. It should be clear after some time, perhaps in a year or so, whether the above issues have been resolved and LETSI merits the same type of relationship that established organizations such as IMS GLC have with SC36..