Technical Comments:

- 5.1.3 Contact, 5.1.5 Individual: Person <=> Contact model mismatches
 - O Suggest aligning with regrep with a common Party class that Organization and Person extend
 - O Add address, phone etc. to Party
 - O Direction of relationship between contact_info and Individual is not intuitive. An individual has contact_info and not the other way around. Consider reversing the relationship
 - O Take away title from Person and instead make it an attribute of association with an organization (titles or roles are in the context of a relationship with some organization)

The term Individual was used in preference to Person because in WG1 (of ISO/IEC JTC1 SC32) Person is defined in the legal sense, which actually corresponds to what OASIS calls a Party.

There also seems to be confusion reflected here about the meaning of the Contact class, which is not simply a record structure for contact information, it instead represents a *role* of a Person (Individual) within some Organization, i.e., is (logically) an association between a Person (Individual) and an Organization. It is for this reason that title is not an attribute of Person (Individual), it is an attribute of Contact. It is also intentional that phone, etc. are not attributes of Person (Individual) either, but rather of Contact. The US TAG has discussed changing the name of the Contact class to Representative, in part to hopefully make this more clear. I suggest we include that suggestion in our ballot comments for CD2.

I do not feel strongly about whether to include a Party superclass in the 11179-3 metamodel, but it was decided previously by the US that such a class was not needed for the purposes of 11179-3, and thus imposing a requirement that implementations provide such a supertype was not justified. Absence of the supertype in the 11179-3 metamodel should not preclude implementations from having such a supertype, the issue is whether it should be required as a matter of conformance.

• 6.1.2.2 Scoped Identifier:

Suggest simplifying identifier scheme. Consider providing an example that maps to a URN naming scheme

I agree that an example would be very helpful. I will propose a ballot comment to provide at least one, in an annex.

- 6.2 Designation and Definition region: This clause is very difficult to follow. Its not clear what a Designatable_Item is. Suggests providing examples and clearer definition.
 - O designation_sign attribute is particularly not clear

I will propose a ballot comment calling for some examples in clause 6.2.2.3.1.

I will also propose a ballot comment suggesting a better definition of designation_sign in clauses 3.4.45 and 6.2.2.3.2.1. Working new definition: sign denoting the designatable item, as represented by a designation.

7.1 Registration metamodel region: Consider aligning this section with ISO 19135

Could you be more specific about what parts of 19135 and 11179-3 ought to be (better) aligned?

I would note that 19135 includes 11179-3 in its bibliography and cites it as the source of two definitions (for identifier and registry). Registration in 19135 appears to have departed from 11179-3 in two main ways:

- 1) A distinction is made between a Register Owner and a Register Manager, whereas 11179-3 only defines a Registration Authority. Is this distinction relevant to 11179-3?
- 2) 19135 formalizes a notion of a hierarchical register. Is this important to also formalize in 11179-3?
 - 8.1.2.1: Concept System section is difficult to understand. Suggest clarifying text and adding examples

Examples are provided in Annex F. I will propose a comment to insert a forward reference from clause 8 to that annex, directing readers to look there for examples.

For clarifying text, more specific comments are requested about what requires clarification.

 RegRep and 11179 have a very different model for handling language specific content. Perhaps this is an area where we can collaborate to achieve better alignment

I think that's a great idea, yes. But it sounds like you'd prefer to put this down as a future task, not a change to be made to 11179-3 at this time, so there is no comment being called for here on the CD2 ballot.

Does the spec have something analogous to ebXML RegRep RegistryPackage? If not, consider adding it as we have found it very useful.

It currently does not, but provision of some type of grouping mechanism has been suggested before, by experts in the US TAG. I think what has been lacking is an articulation of requirements to be met by such a mechanism.

 We were unable to find a place in the spec where Association support and Association metamodel was described. Consider defining a clearer Association metamodel

In some ways the Relation and Link parts of the Concept System metamodel could be considered a specialization of Association as defined in Reg/Rep, scoped to apply only to Concepts (of which many, but not all, of the Data Description classes are subtypes). One difference, however, is that Links in 11179-3 may be of higher arity than 2. Another is that Links do not have one of their ends as the "source"—the "source" of a Link is a concept system(s), rather than one of the ends of the Link.

Another element in the 11179-3 metamodel that highly resembles Reg/Rep Associations is concept system reference (clause 8.1.3.3), which is binary, is directional, and is required to be (sub)typed (it is marked as abstract). An implementer of 11179-3 who wished to do so on top of an implementation of Reg/Rep would be smart to implement concept system reference as a subclass (either explicitly or implicitly) of Association.

Introduction of the very abstract Association facility from Reg/Rep into 11179-3, though, would I think be strongly resisted by the 11179 community at large, because it would be unclear what unmet need such a generic facility would serve, and would raise legitimate concerns about how such things could be interpreted consistently when encountered in a metadata registry.

• We were unable to find a concept equivalent to Repository or Repositoryltem as defined in RegRep. Is this intentionally out of scope? If so, please clarify in 1. Scope section.

I think the closest thing in 11179-3 currently is Reference_Document. 11179-3 does not specify whether the document itself should or should not be stored within the registry, but CD2 does provide an uri attribute by which the document might be accessed, wherever it is stored.

I am happy to propose a comment to state this explicitly in the scope section.

• Examine spec for forward references and minimize whenever possible. An example is that of Designatable_Item

I don't think I would describe this problem as one of forward references, but I hear again frustration about the description of Designatable_Item. This should be captured in a comment, even if we have no specific recommendation to offer as a proposed solution.