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Dear Ms. McQuaid

As is fairly well-known within the GISB community, I was the Project Manager and User Champion for the development of the first natural gas EBB over the Internet. I also recently returned from an assignment in Australia where I had experiences on the Internet that I think are pertinent to some of the proposed standards currently out for comment. Although a majority of my concerns enter into GISB's EBB transition to the Internet for transactions, it is important to register a few concerns over the standards currently proposed by the Internet Look and Feel Team.

The proposed standards currently out for industry comment, as a whole, do not concern me from a technology standpoint. However, if these standards pass the Executive Committee and the GISB ratification process and if GISB pursues the development of Transactional Web Page standards, I believe there will be a technological conflict with some of the proposed standards. For instance, HTML instances are hard coded and provide very little flexibility for the user or developer. The pages cannot effectively be searched, re-used or validated. For this reason, I consistently voted no on any proposed standard that approached the content level of detail throughout the Internet Look and Feel process. With the lack of flexibility in HTML, I do not believe standardization down to the content level, much less the transactional level, can be implemented.

Throughout the Internet Look and Feel process, it seemed to be a common thought that non-transactional and transactional Internet efforts could be considered separately. Unless the provider of the information had two URLs, I don't see how this is feasible. The technologies must be kept the same in order to access transactional pages and informational postings from the same URL.

I demonstrated browser capabilities during the Internet Look and Feel process to show how differently one browser (Netscape) displays the same information from another browser (Internet Explorer). What was demonstrated was an actual Web Page of the ILF proposed standards. I'm not convinced that the impact of what I was demonstrating "hit home" with all of the audience, however, it brought enough doubt into the minds of some that there may be some technology issues that need to be addressed with the proposed standards.

Minimal and Optimal Technical Characteristics

I have the most concerns over this document than any other part of this package. (Eventhough it is proposed that this document only be included in the Implementation Guides, I feel that most of the implementers of the standards consider the Implementation Guides as standards.)

I find that most of the characteristics do not make sense or are inconsistent. In some instances, GISB seems to require more than is necessary; in other instances, the recommended technology is outdated. For example:

1. GISB is recommending 32MG RAM

- When connecting to the Internet while assigned in Australia, I contracted with a US ISP. My response time with 24MG Ram was the same 10,000 miles from home as the response time I experienced when using 32MG RAM while connecting in the US.
- The minimum requirement to access KN's Energy Market is 16 MG. This Web site includes transactional information as well as non-transactional information. Although optimal performance occurs with more RAM, the system operates efficiently with 16 MG.
- Issues:
 - What testing requirements/studies were performed to make the determinations in this document?
 - When we think about the small, less-sophisticated Service Requesters who are still working on 486s, how can we suggest more RAM than is necessary?

1. Optimal

- If we specify, for example, 16k colors as the optimum and we are a minimum standards setting organization and we don't set ceilings, once the next level of "color" is developed, haven't we just set a ceiling?
- If we are not a "ceiling" setting organization, why is this column necessary at all? Even if it's only going into the implementation guide, it is still viewed as a standard set by GISB.
- It's a given that anything greater than the minimum is going to give greater optimal performance and it's also a given the latest and greatest is going to result in optimal performance. I believe, at a minimum for this document, the optimum column should be removed.

1. Use of HTML

- HTML instances are hard coded and provide very little flexibility for the user or developer. The pages cannot effectively be searched, re-used or validated. I have suggested the use of XML as the markup language standard for GISB as opposed to HTML. GISB should take the time to research XML as its standard because of its flexibility. Once again, this will become very important when addressing transactional information.

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Proposed Standard 15

- The Energy Market “Look and Feel” has changed three or four times since its inception. Since this was the pioneering effort using Internet technology for the natural gas industry, there was a lot of trial and error efforts involved. One of those efforts included where to put the Navigational Area. The process went through only having them available as you signed in, only available at the bottom of the page, etc. It ended with having all of the categories left justified on the home page and subsequent pages have the choices at the top.

The implications of requiring a left-justified Site Map result when viewing a confirmation, a notice, a system map, a tariff page, etc. Having the categories on the left side almost always requires scrolling from left to right when viewing the information. Thus, proposed Principle 6 and proposed Standard 15 contradict each other. By offering alternatives and flexibility to Standard 15, (eg. A top justified site-map), scrolling from left to right could be kept to a minimum. This will become a huge issue if GISB standardizes transactions over the Internet.

Summary

In conclusion, it seems that the GISB community lacks in Internet technology knowledge. As a result, some of the proposed standards have the potential to cause problems during the implementation process. That doesn't mean standards-setting cannot be accomplished, however GISB may need to seek help from more experienced resources such as the World Wide Web Consortium (W3C) and Sandia Labs. Both of these groups have performed extensive research in Internet technology. Andersen Consulting is willing to lead efforts such as these during the standards development process but generally feels that the proposed standards out for industry comment, if passed, will conflict with any further attempts to standardize either the Content Area of the Informational Postings or Transactional Web Pages.

Very truly yours,

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Jean M. Ford