

March 4, 2002

Rae McQuade
North American Standards Board
1100 Louisiana
Houston, Texas 77002

Re: Comments on EDM Committee's consideration of requests R01016, R01019, and R01020

Rae,

Please forward the following comments to the EDM Committee chairman. Thanks.

Originally the GISB EDM mechanism was a unique internet transport specification that was not endorsed by any international standards organization. Although GISB EDM was similar to the IETF EDIINT AS1 specification, there were some key differences. These differences were accounted for in the IETF EDIINT AS2 specifications so that the GISB EDM mechanism was a fully contained subset of the IETF EDIINT AS2 specification. This incorporation of the GISB EDM mechanism specifications into EDIINT AS2 was in no small part the work of many industry leaders including Dick Brooks. This incorporation of GISB EDM specifications into the EDIINT AS2 specifications means anyone who has an EDIINT AS2 implementation that is fully configurable can expect to be functionally compliant with the GISB EDM specifications.

Two of the requests currently before GISB's EDM subcommittee, R01019 and R01020, are requests to extend the GISB subset of EDIINT AS2, GISB's EDM specifications, to include more features of the full EDIINT AS2 specifications. We do not need to incorporate more of the AS2 standard specifications because GISB's EDM specifications are a functional subset of AS2. In the Internet Draft draft-ietf-ediint-as2-10.txt, Mr. Brooks acknowledges the legitimate use of restricted subsets of the AS2 standard: "Applications are expected to be able to provide full functionality, though users may agree to exchange data using only a restricted subset of functionality".

The GISB EDM specifications serves the wholesale natural gas industry well in it's current form. The GISB EDM standards these requests propose to modify are standards for the wholesale natural gas segment of NAESB. Since the other segments of NAESB have not voted on the GISB EDM specifications, it is unclear if these specifications will be endorsed by more than one segment. It is conceivable the other three segments of NAESB would have a need for unique subsets of the EDIINT AS2 standard.

The claims that new energy segments must consider other software if GISB does not continue to modify the EDM specifications is contrary to statements of support by certain software vendors. Currently there are eight vendors who offer AS2 certified software that could be used to simultaneously support GISB's EDM specifications and those in requests R01019 and R01020. These vendors and their packages are:

bTrade, Inc.	TDAccess and TDPeer
Cyclone Commerce	Cyclone Interchange Solo
GE Global eXchange Services	GXS - AS2 Adapter
IPNet Solutions	IPNet eBizness Transact
iSoft Corporation	iSoft PTP Agent
SeeBeyond Technologies Corp.	SeeBeyond e*Gate Integrator
TrailBlazer Systems	ZMOD Exchange
webMethods, Inc.	webMethods Integration Platform

Note: There are several other products that have not completed the certification process like EasyLink's EDIINT Access.

If ERCOT needs any of the other 10 multipart/form-data header data elements in the AS2 specification that are not in GISB's EDM specification, they can use these with the assurance that: 1). They have not deviated

from the internet standard 2). There is software that will support multiple subsets of the AS2 standard 3). They can submit a NAESB request to consider EDM standards for the wholesale electric industry.

The exception to the above arguments concerns R01016 and the use of open software. One of the long term goals of the EDM committee and FTTF sub-committee has been to eliminate proprietary standards in the EDM specifications. The request R01016 requests the replacement of proprietary cryptographic software with an open standard software. Before the EDM committee takes action on this request, it would be reasonable to have assurances of the compatibility and feasibility of using OpenPGP with GISB's EDM mechanisms. It would be reassuring to hear from GISB members who have installed OpenPGP on multiple platforms, and who have used it to replace PGP 2.6.2. We also need to consider if we are requiring GISB members to run General Public License (GPL) software which is contrary to the internal standards of some TSPs.

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