**Public review comments for LegalDocumentML specifications**

Authors:

Maria Kardami (Publications Office of the European Union)

Marc Wilhelm Küster (Publications Office of the European Union)

Contributors:

John Dann (Luxembourgish government, ELI TF Chair)

Enrico Francesconi (Publications Office of the European Union)

# Rationale

We request that the compliance to the Akoma Ntoso schema must be separated from a concrete naming convention for cross referencing. Imposing this will probably hinder widely the implementation of this standard.

The following comments aim at making the Akoma Ntoso naming convention one out of multiple possible referencing schemes.

All other schemes, e.g. URN:LEX, ECLI and ELI, **must be possible on an equal footing**. It is important to leave the choice up to the specific requirements of the encoder.

# AkomaNtosoCore-v1.0-Vocabulary

## 2.1 Objectives

Comment type: technical

Impact: major

Requested action:

Reformulate the fourth bullet point to say:

“To create or reuse common mechanisms for naming and linking resources via URI so that documents produced by Parliaments, administrative branches of government and Courts can be easily cited and cross-referenced by other Parliaments, Courts or individual users.”

## 3.6 Schema for citation and cross referencing of documents

Comment type: technical

Impact: major

Requested action:

Reformulate the first two paragraphs as follows:

“This specification proposes a mechanism for citation and cross referencing of data between documents.

*Adopters are encouraged to follow the Akoma Ntoso naming convention or any other functionally equivalent convention for citing and cross referencing between documents. All mechanisms are equally valid in terms of compliance.*”

## 4.1.2 URI/IRI

Comment type: technical

Impact: major

Requested action:

Reformulate the second paragraph as follows:

“Akoma Ntoso gives a lot of importance to URIs/IRIs, and provides systematically specific URIs/IRIs for all documents, concepts of the ontology, and even for the markup language itself. A possible set of such URIs/IRIs are described in the Akoma Ntoso naming convention. Any functionally equivalent set of URIs are equally compliant.”

## 4.1.4 Ontology

Comment type: editorial

Impact: minor

Requested action:

The following formulation is to be clarified:

“Akoma Ntoso allows a large number of different ontologies to be created *in the* document it describes,...”

## 4.1.5 Design patterns

Comment type: technical

Impact: major

Requested action:

Reference the work on legislative patterns undertaken by the UK government. Emphasize the link on logical links that can be encoded in multiple ways reflecting the editor’s preferences.

## 4.3.3 Naming is an editorial process

Comment type: technical

Impact: major

Requested action:

Delete the last sentence (“Nonetheless, it is of the uttermost importance that they are created correctly and precisely according to the Akoma Ntoso naming convention.”)

## 5.8.3 Referring to legal sources

Comment type: technical

Impact: major

Requested action:

Reformulate the first paragraph as follows:

“Another important situation where we use a combination of metadata and semantic annotation in the content is the relationship between a normative citation to a legal source using a different naming convention (e.g., URN:LEX, ECLI, ELI). These citation schemes can be used directly in the href attribute. However, if an implementer wants to use multiple citation schemes in parallel, they can use the following markup method, here exemplified with Akoma Ntoso naming convention:”

## 5.8.3 Referring to legal sources

Comment type: editorial

Impact: minor

Requested action:

Correct the following erroneous ELI examples:

<TLCReference eId="reference\_2" href="http://data.europa.eu/eli/uk/act/2000-07-28/cpt\_23/sct\_58" showAs="alias" name="ELI-UK" refersTo="ref\_13"/>

Change to:

<http://www.legislation.gov.uk/id/ukpga/2000/23/section/58>

Change also

<FRBRalias name="ELI” value=”<http://www.legislation.gov.uk/ukpga/2016/5/>"/>

to

<FRBRalias name="ELI” value=”<http://www.legislation.gov.uk/id/ukpga/2016/5/>"/>

Note that the corresponding URI:LEX reference is equally incorrect.UK documents are identified by year not enactment date.

## 5.9.1 Identification

Comment type: technical

Impact: major

Requested action:

Reformulate the text

“The Akoma Ntoso language allows names for documents that are free of restrictions and can be used everywhere (except in the markup of references) instead of the corresponding URIs/IRIs. These names (called aliases in the Akoma Ntoso language) can be specified to record “well-known” natural language names for the document, as well as shortened names or even acronyms commonly used to refer to a document, see in the example below.”

as follows:

“The Akoma Ntoso language allows names for documents that are free of restrictions and can be used everywhere instead of the corresponding URIs/IRIs. If desired, these names can be specified to record “well-known” natural language names for the document, as well as shortened names or even acronyms commonly used to refer to a document, see in the example below.”

## 7      Levels of Compliance (Non-Normative)

Comment type: technical

Impact: major

Remove “and naming convention of URI/IRI (FRBR metadata)…” from the requirements for level 2 compliance and review all compliance levels in this sense.

Alternatively, change the definition of href in the AkomaNtosoNaming-v1.0, chapter 6 (cf. Below) or add after the table the clarification “Any functionally equivalent naming convention is equally compliant.”

Delete points b, c, d

Note that in any case the reference to section 8 is unclear. This section contains only the conformance clause (which means conformance to the schema).

“b) Documents seeking compliancy level 2 or greater must use attributes eId and wId according to the constraints and rules expressed in section 8 of these notes.

c) Documents seeking compliancy level 1 may use attributes eId and wId, and if they do use them, they must use them according to the constraints and rules expressed in section 8 of these notes.

d) Documents seeking compliancy level 1 and not complying with the constraints and rules for identifiers expressed in section 8 of these notes must not use attributes eId and wId.”

# AkomaNtosoCore-v1.0-Specifications

## Element ref

Comment type: technical

Impact: major

Action required:

Change the definition of the element

currently

<comment>the element ref is an inline element containing a legal references (i.e. a reference to a document with legal status and for which an Akoma Ntoso IRI exists)</comment>

to the following text:

<comment>the element ref is an inline element containing a legal reference </comment>

## Element FRBRthis

Comment type: technical

Impact: major

Action required:

Change the definition of the element as follows:

<comment>The element FRBRthis is the metadata property containing the IRI of the specific component of the document</comment>

Apply the analogous change to the elements FRBRuri, FRBRsubtype.

# AkomaNtosoNaming-v1.0

The naming convention document must be explicitly indicated as a non-normative part of the LegalDocumentML specification and the following changes must be introduced:

## 4.1 Document IRIs

Comment type: technical

Impact: major

Action required:

Change the first paragraph as follows:

“All resources are identified by a unique name. Resources can be categorized as Work, Expression, Manifestation and Item, and each of these categories can have a different naming structure. A possible syntax of the resource is specified in the following section, the “AKOMA NTOSO Naming Convention””.

## 4.2 Absolute and Relative IRIs

Comment type: technical

Impact: major

Action required:

Reformulate the third and fourth paragraphs as follows:

“In XML manifestations of Akoma Ntoso documents, IRI references can be expressed in relative forms.

For relative IRIs any resolution is carried out by the source of the base document (e.g., the one where the IRI reference is stored).”

Delete the seventh paragraph or reformulate it to permit both global references on all levels:

“In XML manifestations ... corresponding component.”

## 5.  Identifying elements of document (Normative)

Comment type: technical2

Impact: major

Action required:

Change the third paragraph to say:

“The Akoma Ntoso XML vocabulary uses three different attributes for the attribution of ids to elements. All of them are optional for basic conformance, and required for higher level conformance. While the use of eIds and wIds is not required for basic conformance, they CAN use the syntax described here IF used.“

## 5.4.1 Elements That Require an eId Attribute

Comment type: technical

Impact: major

Action required:

Change the text to say:

“The use of attribute eId is optional for conformance level 1. If attribute eId is used, then it CAN be used according to the syntax in section 5.2, any functionally equivalent syntax being equally conformant. If attribute eId is used in a document, then it is required for all elements that use or include attribute group idreq, and optional in all elements using or including attribute group idfac.”

## 6.  Conformance

Comment type: technical

Impact: major

Action required:

Delete text starting with “#2 an XML document is...”

Alternatively, in 2.1, 2.2, and 2.3 change MUST to CAN and permit any compliant simple link (cf. 5.2 of the XLink specification) that uniquely identifies a target document or a fragment thereof. In order to do this allign the definition of the href attribute with the XLink 1.1 definition of the corresponding attribute xlink:href (cf. 5.4, <https://www.w3.org/TR/xlink11/#link-locators>).