NIST has not submitted comments or rebuttals. The Editor's response is the only set of statements from NIST

| Comment Number | Comment | Editor's Response |
|---|---|---|
| 1 | Merging of the traditional and NIEM-conformant XML versions of the standard: We are OK with this proposal | |
| 2 | There are several references to "three specific encodings (Character-separated, NIEM XML and short-tag XML) But, the base standard had - and will continue to have - a binary format that does not use character separators, used fixed field length, and does not use ASCII numerics. This draft refers to character-separated encoding, binary encoding and tagged-field encoding. Since 'binary encoding' is used for record types 3-8 (where character-separators are not used) and other record types (e g Type 14) use character-=separators" and both could be contained in the same message, the terminology is confusing. To avoid confusion all references to "Tagged field' encoding should be edited out of this version because XML is also a tagged-field encoding method. The terms "legacy encoding' or "non-xml encoding' and 'xml encoding" will cause less confusion | The new (second) draft removes the terms 'tagged field" and changed 'character separated' to 'Traditional' encoding. Other modifications were made to the text in an attempt to make it clearer in this respect. |
| 3 | Relocating XML-specific requirements to Annexes is mostly acceptable, although many XML descriptions have been removed rather than relocated. In the Conformance Section of 2-2008 was a paragraph allowing the ANSI/NIST package to be included as a payload in a larger package. This clause, arguably, would be useful to any encoding, and should be resotred to the 102010 section on conformance | |

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| 4 | The information contained in the Annexes is required to understand the text in the record descriptions. Turning back and forth between the base standard and one or more annexes is extremely difficult. | Agreed. Annexes are removed from the second draft. Relevant tables are now in each Record type description and the encoding rules are moved to external documents. |
| 5 | A summary of all the fields in each record type should be present in the base document description of each record type | Agreed |
| 6 | It is not clear where the mapping between the field numbers/mnemonics and the XML elements will be documented. It was taken out of both Annex K and the main document, but it needs to be somewhere (preferably expressed in XPath, not just simple element names). | Agreed. The glossary / Crosswalk document will provide this information. At present, I have not had time to change the "long name" to the XPath reference for all of the fields (in fact for only a few!) VOLUNTEERS WELCOME! |
| 7 | Regarding the paragraph after the bullets in Section 1, "The 2010 version is based upon several…" The 2011 version should not be based on these studies but on the outcomes of the July workshop; even though these studies obviously contributed to the outcomes of the workshop. | Agreed. Hopefully, the new wording reflects this point clearly |
| 8 | I would like to suggest we put back into the table the minimum and maximum field size per occurrence character count per data element, but only post in the table the lowest data element level (ie VER, REC,CRC,IDC,TOT,DAT etc). This would bring most of the specification documentation out there in line with each other (including the FBI) and is more understandable from the layman's eye. Ie a Date filed is 8 characters (YYYMMDD) and not 9 (YYYMMDDs) | |