

PDF ASSOCIATION, DUFF JOHNSON

Proposal and Comment Information

Title: Financial Data Transparency Act Joint Data Standards, R-1837

Comment ID: FR-0000-0136-01-C150

Subject

Re: Docket No. R-1837 and RIN 7100-AG-79

Submitter Information

Organization Name: PDF Association

Organization Type: Organization

Name: Duff Johnson

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Re: Docket No. R-1837 and RIN 7100-AG-79

US Financial Data Transparency Act

Comment on a Proposed Rule

To whom it may concern,

This comment replaces our previous comment,

<https://www.federalreserve.gov/apps/proposals/comments/FR-0000-0136-01-C149>

with a more readable version. The text remains the same as in the original comment.

Unfortunately, this Proposed Rule came to our attention after the end of the comment period. Nonetheless, the PDF Association wishes to register a technical comment regarding manifest errors in references to “PDF/A” in the Proposed Rule for the US Financial Data Transparency Act, specifically in this paragraph:

<https://www.federalregister.gov/documents/2024/08/22/2024-18415/financial-data-transparency-act-joint-data-standards#p-175>

Background for this comment

The paragraph above references “PDF/A.” This appears to refer to the ISO-standardized subset of the PDF file format addressing long-term preservation, defined by the ISO 19005 family of standards. However, this paragraph makes materially incorrect assertions about PDF/A and fails to specify which part(s) and conformance level(s) of PDF/A are necessary to meet the Rule’s requirements. This lack of specificity inhibits a common understanding of the requirements and, thus, any industry response.

We write in the hope that these facts may be corrected and that the Rule be enhanced to include accurate, salient requirements regarding the use of PDF and its associated international standards to advance the purpose of the Rule.

Specific concerns

Hereunder we quote the text of the rule and provide comments.

In the above-referenced paragraph, the text of the rule asserts:

...PDF may satisfy the standard if the data within the PDF conforms to specification "A" (PDF/A) that uses advanced features for tagging fields with a reference schema and taxonomy...

The facts: While permitting the use of the described features, PDF/A does not include any substantive provisions regarding these features in terms of tagging fields or for use with reference schemas and taxonomies. The features referenced in the Rule's paragraph are native to PDF itself (as defined by ISO 32000), not PDF/A, which deals primarily with the long-term preservation of documents.

The PDF Association recommends the rule be corrected to explicitly state compliance to PDF/A-3 (ISO 19005-3) for PDF version 1.x, or PDF/A-4 (ISO 19005-4) for PDF 2.0, to ensure that the recordkeeping requirements of [44 U.S.C. 3502\(13\)](#) are achieved. Furthermore, both these standards support conformance levels that permit the use of "tagged fields" (technically, "Tagged PDF") as well as the embedding of "schema and taxonomy data" to "provide necessary metadata that allows for automated data extraction".

Additionally, conformance to the appropriate parts of PDF/UA (ISO 14289) ensures that the same PDF documents will meet accessibility requirements for, e.g., the Americans with Disabilities Act (ADA), Section 508 of the US Rehabilitation Act of 1973, or other as applicable.

Proposed replacement text (**bold face** indicates proposed replacement)

PDF will satisfy the standard if the PDF files conform to PDF/A-3 (ISO 19005-3) for PDF version 1.x, or PDF/A-4 (ISO 19005-4) for PDF 2.0, to comply with the recordkeeping requirements of [44 U.S.C. 3502\(13\)](#). PDF files conforming to these ISO standards support the use of "Tagged PDF" and the embedding of schema and taxonomy data allowing automated data extraction. Additionally, the same PDF files may conform to PDF/UA-1 (ISO 14289-1) for PDF version 1.x or PDF/UA-2 (ISO 14289-2) for PDF 2.0 if support for accessibility features is required. HTML and PDF documents whose data does not conform to any such schema and taxonomy would not be considered machine-readable as that term is defined in the FDTA because the data contained in such HTML and PDF documents cannot be easily processed by a computer without human intervention while ensuring no semantic meaning is lost.

About the PDF Association

The PDF Association (pdfa.org) is the international industry association responsible for maintaining and developing the PDF file format and associated ISO standards, including the ISO 32000 series (the core PDF specification), the ISO 19005 series (PDF/A, for long-term preservation), and the ISO 14289 series (PDF/UA, supporting universal accessibility). ANSI has accredited the PDF Association to manage and operate ISO's TC 171 SC 2, the ISO committee responsible for these important global standards.

These comments were prepared by the PDF Association's CEO, Duff Johnson, and its CTO, Peter Wyatt, the ISO co-Project Leaders of the PDF specification, ISO 32000.