

<b>Name Einrichtung:</b>
<b>Land (Name) / Bund:</b>
<b>Name / Kontakt</b>
<b>für Rückfragen von GKSt. GDI-DE:</b>

**IMPORTANT INFORMATION TO FULFILL THE TABLE**  
Some parts of the table are locked and the user cannot change them.  
All the comments should be entered into ONE table and put into ONE w  
User can add new rows, format cells, clear contents, sort the content of

1	2
<b>Comment ID</b>	<b>Chapter, section or clause no./Subclause No./ <a href="#">Note [1]</a></b>
1	
2	Purpose of the document
3	Normative references
4	Normative references
5	4.1.1
6	4.1.3
7	4.3.1
8	4.3.1

9	4.3.1
10	4.3.2
11	4.3.2
12	4.3.2
13	4.3.2
14	4.3.2
15	9.6.4
16	9.6.4
17	9.6.5

18	11.1
19	11.1
20	11.2
21	11.2
22	13.2.2
23	16.5

24	B.4.4
25	9.4
26	9.5
27	9.6.1
28	9.6.2
29	9.6.3
30	9.6.4
31	9.6.5
32	10.2
33	11.1
34	11.1
35	12.2
36	16.1

[1] Use "3.1" instead of "Clause 3.1" or "Chapter 6.1". This makes group

[2] E.g., Table 1

[3] Type of comment can be G (general), E (editorial), T (technical)

[4] The proposed change must be as precise and specific as possible.


Worksheet. This worksheet should be the first worksheet in the workbook in the case of the table and uses other tools.

**DS - D 2.5 - Draft INSPIRE Generic Conceptual**

3	4
Paragraph/Figure/Table <a href="#">Note[2]</a>	Type of comment <a href="#">Note[3]</a>
(References to other documents)	G
	G
page 9, EN ISO 19115:2005, Geographic information — Metadata	G
page 9, EN ISO 19115:2005, Geographic information — Metadata	G
Article 7 (2)	G
a)	G
2nd dash	G
4th dash	G

4th dash	G
Table 1, (A) Principles	G
Table 1, (I) Data translation model	G
Table 1, (K) Identifier management	E
Table 1, (L) Registers and Registries	E
Table 1, (M) Metadata	G
page 44, 7th dash	G
page 45, Example 4	G
page 47, 2nd dash	G

page 53, Note 1	G
page 53, Requirement 45 i	G
page 55, Requirement 51 and 52	G
page 55, Requirement 51 and 52	G
page 60, Example 2	E
page 70, Requirement 72	G

	G
Figure 7	E
Requirement 21	T
Requirement 22	G
Figure 10	E
Figure 11	T
	T
Figure 16	E
Recommendation 10	T
Requirement 45	T
Requirement 47	T
Recommendation 13, 14	T
Requirement 68	T

[ing of comments easier.](#)



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use it consists of many worksheets.

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## Model: Comments Sheet

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### Comment (justification for change)

Not all quoted documents are accessible.

This paper comprises extensive technical specifications.

In this document the normative reference for metadata is ISO 19115:2005. The conceptual model of the GDI-DE is related to ISO 19115:2003

OGC's new (July 2007) Implementation Specification: OpenGIS® Catalogue Service Specification 2.0 - ISO Metadata Application Profile, Version 1.0, references ISO 19115:2003. As stated above, this will be the Application Profile for GDI-DE.

The change is proposed in order to stay in accordance with a working Implementation Specification.

Article 7 (2) addresses the Commission to undertake a feasibility and cost/benefit analysis **before** ("as a basis") the implementing rules are developed. As the development of implementing rules has begun earlier than the Directive was adopted, there may now be a non-conformance with Article 7 (2). By this, a pre-requisite for the Drafting Teams developing implementation rules is missing. The Drafting Team "Data Specifications" has already commented Article 7 (2) in the draft, but the comment should also state more clearly, what will be done in this situation.

"a) ... (it is assumed that INSPIRE data will typically be accessed through download services which are assumed to provide direct access to spatial objects) ..."

Text reads as follows:

"A mechanism that provides a common language to support needs at European Union and other large cross-border and cross sector levels is required."

Question: Is here really a **common language** required?

Maybe it is more a common set of methods for harmonisation, that is needed here.

Text reads as follows:

"- The main goal at least for the foreseeable future will be to achieve a "virtual harmonisation" by enabling interoperability in a service-based architecture rather than harmonisation of the underlying conceptual models."

Virtual harmonisation is a concept, that will be hard to realize even between quite similar data models. In some cases much of time will be needed for the development of transformation services that are perfect enough to work on-the-fly

Table 1, (A) Principles reads as follows:

"- that spatial data are stored, made available and maintained at the most appropriate level;"

Comment: This does NOT mean, that all of this has to be done on the SAME level. E.g., Maintenance on Level 1, data storage on Level 2 and distribution on Level 3 should be a feasible

option.  
Comment: The NOTE explains that this is one of the "soft" points yet. The development of a working translator for one given data model, when in many cases the translation even may be dependent of the content of the data fields, can take very long time. A two-way translator would be even more difficult to develop and operate.

The problem is similar to migration from one data model to another. But migration is easier, because it works one-way, it is performed once, and it is allowed to take time, often years.

Parallel to doing virtual harmonisation on-the-fly one should consider to let the data owner produce intermediate datasets that are consistent with new data models of INSPIRE. By this, responsibility will stay at the data producer's side, not at the translator's.

The identifier management should be expanded by buildings (Annex III).

With regard to products (dataset series) that comprise several datasets, it is not sensible to define metadata on dataset level.

Harmonisation for Geo-Specialist Metadata is necessary. These can not be described with ISO 19115.

The text reads:

"The temporal version attributes are in system time, which is the time at which the spatial object was entered or updated in the data set."

Comment: This may work for remote sensing data, etc. System time will be of little use or no use at all when combining other objects from different sources. Here a better way of temporal attribution should be devised.

Comment: This method only shows when the **dataset** was last updated.

Comment:

Free text is a simple but not a very effective form of supporting multilinguality, as a human is required to look for the appropriate language. For machine-readable information, it is suggested to support multilinguality using thesauri.

Requirement 44 on p.53 says the same.

In addition, it should also be considered that the entries in the

Comment:

Addresses should be structured as far as possible and use only little free text. This gives better possibilities for the usage of datasets containing addresses.

Comment: Requirement 45 ist not clear. Shall such text be parsed?

Comment: Some care should be taken to avoid duplicate coordinate systems, with the only difference being the sequence of parameters ((x=Right,y=Height) vs. (x=Height,y=Right)).

Question: What is meant by "valid across Europe"? Are CRSes meant, that are to cover the whole of Europe each - or is partial coverage allowed, too?

A misspelling, the name of this German state is "Hesse".

"Requirement 72: All namespaces shall start with a code that unambiguously identifies the data provider."

Question: Does this method cover the situation that exactly identical data can be obtained from more than one data provider?

Sufficient solutions or concepts for cross-border features seem to be missing in the Conceptual Model.

Example: If the parts of a border-crossing feature are supplied by several data providers, the parts will be identified by different keys (identifiers), as the provider identifier will be part of the feature identifier. A technique is needed to show that the parts belong to the same object in reality.

The text in B.4.4 seems to be too general with respect to the requirements of article 10 (2) of the Directive. Admittedly, a thorough implementation of B.4.4 could be a solution of the problem, putting together the parts (single features) of the object either when calling it or in advance. These expectations seem to be - also with respect to experiences in the context of the WFD - too ambitious.

Unclear UML notation. The OCL constraints seem to be part of the definition of an operation since it is listed at the bottom of a class.

It should be sufficient to specify constraints just in UML and derive those information to a feature catalogue. The additional description in natural language causes unnecessary efforts on keeping consistency.

Where and how are specified non spatial objects?

In commonly used UML notation the cardinality of attributes is specified just after the attribute name (and not at the end of the column).

Why is there a separation between ObjectWithIdentifier and ReferencableSpatialObject? By using unique identifiers generally all objects are referenceable.

„The rules governing the versions are:

...

-As a corollary: There is no temporal overlap or gap between the different versions of any spatial object.“

In the context of geodetic reference points there is the possibility of gaps between different versions of one object.

The class at the bottom "ReferenceableSpatialObject" shows strange UML.

„... where all curve interpolations are linear.“

What about cubic splines that are not linear curves but often used in topographical data?

Does this also effect the implemented data in the member states or "just" the annex themes?

„English shall be used for class, attribute and association role names throughout the UML model.“

This will cause a mapping between national data sets and the INSPIRE data on the level of tag names, etc.

Potentially some theme specific objects cannot be applied to these reference systems due to their limited presentation scale range (e.g. cadastral parcels).

Also on the European level it should be possible to define attributes that - in case of changing them - will cause deletion of an object (e.g. the change of parcel identifier | causes the deletion of the corresponding parcel). Where possible, the life-cycle rules for spatial object types in a spatial dataset should be documented in the application schema and not just in the metadata of the dataset.



6	
<b>Proposed change</b> <a href="#">Note[4]</a>	
Please add links to all documents or - if no links are available - give advice, where to obtain documents.	BE/BB
The details should be expressed as a suggestion.	RLP RLP
Change reference to ISO 19115:2003.	GKSt. GDI-DE
Amend the commenting text after "Article 7(2) will be addressed by the Commission, but it should be added that the Drafting Team has proposed to validate the proposal in parallel to the consultation process by testing the draft in one or more pilot projects." <b>adding:</b> "Feasibility and cost/benefit analyses will be provided in parallel with the development process of implementation rules for Data Specifications and before these implementation rules become effective."	GKSt. GDI-DE
Please explain further the term "download services". Does it also comprise the transfer of data for <u>local viewing</u> services?	GKSt. GDI-DE
Please clarify what is intended here.	GKSt. GDI-DE
Please add: "The data sets where it is practicable to do virtual harmonisation still are to be defined - as well as other data sets (e.g. with complex data models) where this method is not practicable."	GKSt. GDI-DE

<p>Add: "Time pressure effected by transformation on-the-fly can be avoided if the data owner is willing to produce an intermediate data set that is consistent with the new data models of INSPIRE."</p>	<p>GKSt. GDI-DE</p>
<p>Add comment: "This does not mean, that all of this has to be done on the <b>same</b> level. E.g., maintenance on Level 1, data storage on Level 2 and distribution on Level 3 can be a feasible option."</p>	<p>GKSt. GDI-DE</p>
<p>Add text: "Parallel to doing virtual harmonisation on-the-fly it is under consideration to let the data owner produce intermediate datasets that are consistent with new data models of INSPIRE. By this, responsibility will stay at the data producer's side, not at the translator's."</p>	<p>GKSt. GDI-DE</p>
<p>Change: Spatial objects from Annexes I, II and the theme "building" (Annex III) <del>should have an external object identifier.</del></p>	<p>RLP</p>
<p>Add: "In many cases, metadata on dataset series level may be sufficient."</p>	<p>RLP</p>
<p>Add: "As metadata for geo-specialists cannot be described with ISO 19115, appropriate measures will be needed."</p>	<p>RLP</p>
<p>Add text: "In addition to the system time method, other methods for describing temporal versions are: - metadata, and - special attributes for an object. The appropriate methods used will be part of the data models."</p>	<p>GKSt. GDI-DE</p>
<p>None</p>	<p>GKSt. GDI-DE</p>
<p>Add a footnote or note: "Using free text for multilinguality is subject to further consideration."</p>	<p>GKSt. GDI-DE</p>

Add a piece of text:  
"INSPIRE data models will take care of the structure of addresses, as defined in international standards."

GKSt.  
GDI-DE

Please clarify.

GKSt.  
GDI-DE

Please add a piece of text, like:  
"When defining Coordinate Reference Systems, some care should be taken to avoid duplicate coordinate systems, with the only difference being the sequence of parameters ((x=Right,y=Height) vs. (x=Height,y=Right)). The parameter sequence (x=Right,y=Height) should be preferred."

GKSt.  
GDI-DE

Please clarify.

GKSt.  
GDI-DE

Please change to: "Hesse".

GKSt.  
GDI-DE

Please clarify.

GKSt.  
GDI-DE

<p>Add: " If the parts of a border-crossing feature are supplied by several data providers, each part should be marked, that there are further parts belonging to it. This can be done (e.g.) by referencing all the other identifiers. The Conceptual Model will be amended accordingly."</p>	<p>LANUV NRW</p>
<p>Clarify the requirements on UML notation or change figure</p>	<p>GDI-BY-sei</p>
<p>Delete recommendation</p>	<p>GDI-BY-sei</p>
<p>Clarify</p>	<p>GDI-BY-sei</p>
<p>Change notation or specify the rules that are applied</p>	<p>GDI-BY-sei</p>
<p>Clarify the reason or correct the figure</p>	<p>GDI-BY-sei</p>
<p>Allow gaps under specific circumstances</p>	<p>GDI-BY-sei</p>
<p>Please explain the UML notation that has to be applied in the theme <u>models</u>.</p>	<p>GDI-BY-sei</p>
<p>Please clarify</p>	<p>GDI-BY-sei</p>
<p>Please clarify</p>	<p>GDI-BY-sei</p>
<p>Please add the possible consequences to national data bases</p>	<p>GDI-BY-sei</p>
<p>These pan-European reference systems should only be applied to lower scale presentations, depending on the specific user requirements.</p>	<p>GDI-BY-sei</p>
<p>Please allow life-cycle rules also in application schemas.</p>	<p>GDI-BY-sei</p>
<p></p>	<p></p>