

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
1.	KR	Entire Section	Entire Section	ge	Recommend to write the S-121 document in accordance with the template of S-100 Part 11.	Propose to adjust the S-121 document using the standard template.	
2.	KR	Introduction (p.1)	para.4	ge	<p>To prevent disputes concerning S-121, we request adding a disclaimer to the introduction part of this specification stating that this specification has no legal effect and admissibility as evidence in a court, that the information provided by this specification does not represent the official position of the International Hydrographic Organization (IHO), and that this specification bears no effect on the delimitation of maritime boundaries.</p> <p>In addition, we request that such disclaimer must not only be included in the S-121 itself but also be displayed on S-121 based products such as electronic nautical charts.</p>	<p>At the end of paragraph 4, insert the following paragraph:</p> <p><u>“DISCLAIMER</u></p> <p><u>Nothing in this specification (S-121) and its products shall be construed to have legal status of any kind. The S-121 and its products shall not have any legal value and shall not have any admissibility of evidence in a court, tribunal, or other legal venue. The boundaries and names shown and the designations used in the S-121 do not imply the expression of any opinion whatsoever on the part of the IHO concerning the legal status of any country, territory, or area; or of its authorities; or concerning the delimitation of its frontiers and boundaries. It should be emphasized that the S-121 and its products shall not be considered as an endorsement of one claim over another in areas where a maritime boundary is yet to be agreed.”</u></p>	
3.	KR	1 Overview (p.2)	1 Overview (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of	“The S121 is a product specification for Maritime Limits and Boundaries for the administration of the marine domain. Its data model allows for the description of marine areas, as defined by the UN Convention on the	

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					developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	Law of the Sea (UNCLOS), and their associated rights, restrictions and responsibilities while also allowing States to represent generic objects as necessary. Its exchange formats will assist States Parties in meeting their depository obligations under UNCLOS, as well as other legal declarations; and will support integration with other S-100 based products."	
4.	KR	1.1 Scope (p.2)	1.1 Scope (para.1)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"This document describes a product specification for the administration of maritime limits and boundaries in support of the deposit by States Parties of the geographical coordinates of points identifying their baselines and outer limits of maritime zones in accordance with UNCLOS, and other technical and legal requirements. This Product Specification complies with the IHO S-100 Universal Hydrographic Data Model."	
5.	KR	1.2 Conformance Clause (p.2)	Comment	te	The concept of Conformance Test does not exist in S-100.	Remove the part of Conformance test in accordance with the template for S-100 based PS.	
6.	KR	1.5 S-121 General Data Product Description	Abstract	te	Need to include the validation rather than testing with conformance classes of Appendix A.	Replace Conformance test with validation.	

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		(p.4)					
7.	KR	1.5 S-121 General Data Product Description (p.4)	Abstract (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and one of its purposes is to provide a flexible and expandable framework that can support the requirements for delimiting the maritime boundaries of areas such as overlapping jurisdictions, joint development areas, or other maritime management areas. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"The purpose is to establish a framework of sourced and versioned objects for communicating in a digital form the geographic extents of marine areas and the associated rights and restrictions that apply to them as well as to provide a flexible and expandable framework able to support other maritime delimitation requirements such as defining areas of overlapping jurisdiction and Joint Development Areas, or any other maritime management areas. "	
8.	KR	1.5 S-121 General Data Product Description (p.5)	Specific Purpose (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and one of its purposes is to provide a flexible and expandable framework that can support the requirements for delimiting the maritime boundaries of areas such as overlapping jurisdictions, joint development areas, or other maritime management areas. This is clearly beyond the	"The purpose of this product specification is: a. The establishment of a data model that supports the description in a digital form the geographic extents of marine areas and b. The associated rights and restrictions that apply to them c. To provide a flexible and extensible framework able to support other maritime delimitation requirements such as defining areas of overlapping jurisdiction and Joint	

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					scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	Development—Areas, or any other management areas."	
9.	KR	1.5 S-121 General Data Product Description (p.5)	Specific Purpose (para.2)	ge	One of the purposes of this specification (S-121) is to provide legal descriptions of maritime boundaries that can easily be presented in courts or other legal venues. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"(3) This standard also establishes a structured text record oriented exchange format that is readable and comprehensible by both the human eye and a computer. This exchange format is designed to support the description of legal aspects of the MLB features in a manner so that they can easily be presented in a court or other legal venue. This data needs to look similar to the current text in treaties and laws. This human readable format is the encoding required to facilitate the States Parties' deposit obligations under UNCLOS."	
10.	KR	2 Specification Scope (p.7)	2 Specification Scope (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the	"This Product Specification describes the S-121 data model for Maritime Limits and Boundaries which contains a set of features to which can be attributed specific party, rights, restrictions, responsibilities and sources as defined in applicable legislation. "	

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					2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”		
11.	KR	4.1 Introduction (p.9)	4.1 Introduction	ge	The S-121 proposes three use cases, and using the term “sub-products”, which is inappropriate.	Need to change the term “sub-product” to another appropriate one.	
12.	KR	4.1 Introduction (p.9)	4.1 Introduction (table.44-1, 2.Legal Declaration)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	<p>“ 2-Legal Declaration MLB features as defined explicitly by location in national legislation and or bilateral and multilateral treaties and MLBs that have been included in such legislation by reference to a process that may require additional administrative or technical intervention. Usage may be limited depending on the Implementation policies associated with the State’s governance procedures.</p> <ul style="list-style-type: none"> • Provide human and computer readable file to support the creation of legal declarations. • Support deposit to the UN Secretary General in accordance with UNCLOS.” 	
13.	KR	4.2.1 Feature Catalogue	4.2.1 Feature Catalogue	te	The document states that the feature catalogue is included in the Annex, but it is missing.	The S-121 feature catalogue should be provided for review.	

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14.	KR	4.2.4 Geometry (p.11)	4.2.4 Geometry (para.6)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Although S-121 data may use the full palette of S-100 Level 3a geometry there is a distinction between the geospatial locations represented in the implicit geometry of each feature and any documented positions (and line interpolations) associated with individual features required for documentation of positions in accordance with legal sources. "	
15.		5.1 Horizontal reference system (p.12)	5.1 Horizontal reference system (para.3, 4)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Latitude and Longitude may also be stored as textual strings. This is required so that positions may be described in the exact format that they are described in the legal document (treaty or national legislation) they were extracted from. If a position is described in legal document in degrees, minutes and seconds then this description must be retained in the textual string as degrees, minutes and seconds because a conversion to decimal degrees would imply a transformation that would change the data from its legally defined value . The same latitude and longitude position may also be stored as a transformed point as a set of real numbers within a GIS system so that it can be used. That is, the values used in legal documents must be preserved, but points and other geometric primitives may have multiple representations.	

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						Different reference systems are used by various nations. Since data may come from different legal sources such as different treaties, multiple coordinate reference systems may be used in the same dataset.”	
16.	KR	6.2.1 Redundant or oversampled data (p.13)	6.2.1 Redundant or oversampled data (para.1)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“MLB data is legal data and therefore redundant and oversampled data elements are not permitted. It is up to the data producer to ensure consistency with legal source documentation and correct attribution as such in the S-121 dataset.”	
17.	KR	6.3.4 Topological consistency (para.14)	6.3.4 Topological consistency (para.2)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“The data must align with the original treaties and legal documents upon which it is based. Any inconsistencies resulting from the integration of data from different sources (different treaties or other legal sources) must be identified and accommodated but the original legal data representation must not be changed.”	

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18.		6.4.1 Absolute external positional accuracy (p.14)	6.4.1 Absolute external positional accuracy (para.1~3)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	“ Legally authoritative data has by definition absolute accuracy because it represents a legally defined position without legal qualification. Legally authoritative data may be described in treaties, national legislation and/or deposits in compliance with UNCLOS. These absolute accuracy positions may be included in a data set along with derived data. Official data has by definition absolute accuracy because it depicts a determination of a state’s maritime limits and boundaries where no legal process exists to make it authoritative or where a technical process has been required to realize the data; although errors may exist in the data no disadvantage will apply to a user that acts in good faith. Official data may be described in treaties, national legislation and/or deposits in compliance with UNCLOS and become legally authoritative data. These absolute accuracy positions may be included in a data set along with derived data. Official data may be normalized to a single spatial reference system. Cartographic only data - Data derived from legally authoritative or official data has the accuracy of the transformation or other process used to generate the data. Cartographic data may be used to inform decision makers but are inadequate where legal certainty is required. A location may be represented by a point that has an absolute (legal) accuracy in one Coordinate Reference System, but has a different transformed value	

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						in another CRS.”	
19.		6.5 Temporal accuracy (p.15)	6.5 Temporal accuracy (para.1)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“Constituent of data features may be established at different dates. A validity attribute is mandatory for all features. A single creation date may be assigned to a component feature derived from different sources. The source description shall be used to describe the difference between the actual establishment (collection or legal) date of a feature and any date assigned to a group.”	
20.	KR	6.7 Dataset Validation checks (p.15)	6.7 Dataset Validation checks (para.1)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“A comprehensive set of dataset validation checks will be included as Annex C to this Product Specification. These form a minimum set of data validation tests and do not provide assurance that features meet an intended level of logical, legal or topological consistency. Validation against sources, real world conditions and legal structures (including UNCLOS itself) are the responsibility of the issuing data producer. This section of the Product Specification contains guidance to ensure a minimum level of consistency is achieved across all S-121 datasets.”	
21.	KR	7 Data Capture and Classification (p.15)	7 Data Capture and Classification (para.1)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the	“Maritime Limits and Boundaries data is primarily acquired from multiple external and internal sources. Critical points may be defined in treaties and other agreements. The	

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					2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	S-121 source feature is designed to support references to legal sources."	
22.	KR	9 Portrayal (p.16)	9 Portrayal (para.2)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Data deposited with the UN Secretary General to address the deposit obligations in compliance with UNCLOS are textual, formatted to resemble legal documents that can be read without the need for special tools or software; and contain no graphical portrayal over and above that specified within this Product Specification."	
23.	KR	10 Data Product Format (Encoding) (p.16)	10 Data Product Format (encoding) - 1) Production (para.1)	te	Annex B describes the S-121 data product format, but it is not listed in S-100 4.0.0. It is XML format for printing purpose.	S-100WG needs to discuss the new encoding before it is included in the S-121 PS.	
24.	KR	10 Data Product Format (encoding) (p.16)	10 Data Product Format (encoding) - 2) Legal Declaration	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly	"2) Legal Declaration—Data is provided as official legal declaration of MLB objects including supporting information that can be used to verify the correctness of the data. It is	

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			(para.2)		resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	important that legal support data be simple to interpret."	
25.	KR	11. Data Delivery (p.17)	11. Data delivery	te	Need to use S-100 GML considering the interoperability with other S-100 based data	Propose to use S-100 GML rather than the general GML of ISO 19136	
26.	KR	12. Metadata (p.17)	12. Metadata	te	Need to include metadata model to distribute S-121 MLB data.	Customize the metadata model based on S-100 4.0.0 and include it in the S-121 MLB document.	
27.	KR	A 4. Test case for data completeness (p.20)	A 4. Test case for data completeness (table.A-1 2. Legal Declaration)	ge	This specification (S-121) is intended to have a legal effect and to support legal proceedings. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"2 Legal Declaration Legal Conformance Class All available Features and Attributes required to support legal proceedings. See Appendix B, clause 2"	
28.	KR	A 10. Test case for data accuracy (p.21)	A 10. Test case for data accuracy (p.21)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly	"b) Test method: Verify that all data elements are either of absolute accuracy (legally declared) or associated with metadata elements or source objects that describe the accuracy."	

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					resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”		
29.	KR	Appendix A Abstract Test Suite and Conformance Classes (p.19)	A 4. Test case for data completeness	te	The concept of Conformance Test does exist in S-100.	Remove the part of Conformance test in accordance with the template for S-100 based PS.	
30.	KR	Appendix B B.1 Overview (p.23)	B 1. Overview - 2) Legal Declaration Dataset (para.6)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“2) Legal Declaration Dataset – Legal declaration of legally authoritative or official MLB feature(s) extracted directly from the administration environment at a specific date and time. Its usage may be limited depending on the implementation policies associated with the State’s governance procedures.—This dataset is a human and computer readable file formatted to contain all elements to be considered a valid legal declaration. Such a dataset can be used to support a State’s activities aiming to create, manage and update an official legal declaration defining MLB features and can be used to deposit data to the UN/DOALOS in compliance with UNCLOS related obligations.”	
31.		Appendix B B 2. Use	Use Case #1	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope	“Use Case #1	

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		Cases #2 (p.24)			of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	Activity and usage description: The relevant parts of the legally authoritative and official data and their associated official metadata."	
32.	KR	Appendix B B 2. Use Cases #2 (p.24)	Use Case #2	ge	This specification (S-121) can be used for specific legal purposes as well as be utilized in legal proceedings and for legal consultation purposes. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	<p>"Use Case #2</p> <p>Name: Legal Support Data</p> <p>Number: 2</p> <p>Description: Allow the gathering of information that pertains to specific legal purposes, involving legally authoritative and official data and metadata release, linkages between release editions or computation dependencies between the different products.</p> <p>Output: The output of this use case is an extract from the Administration Dataset at a specific date and time as well as all the supporting information that can be used to verify the correctness for use in legal proceedings. The data must be easy to read by legal practitioners and may consist of structured text with a possible associated illustrative map. Since the main objective of this output is human readability, where conflict exists between computational efficiency and ease of parsing and legal drafting norms,</p>	

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						<p>clarity for a human audience will be a priority. Primary Actors: Legal proceedings, deposit in compliance with the depositary obligations of UNCLOS. Precondition: Specific request needs to be made to define the criteria to be used in the data extraction from the database. Access rights: Read access only. Required Products: The entire official legal support data and all associated official metadata plus additional legal references, documentation and computational relationship between the data elements. Activity and usage description: Legal consultation purposes, deposit in compliance with the depositary obligations of UNCLOS. Note: Some material may be covered by national release policies, legal protection orders or other legal restrictions and related security needs to be maintained.”</p>	
33.	KR	Appendix C. Application Schema (p.28)	Entire section	ge	Impossible to read the UML figure due to low resolution images.	Replace the figure and need to review it again.	
34.	KR	Appendix C. Application Schema (p.27)	Entire section	te	There is no UML diagram to explain the contents of S-121 MLB Application schema.	Add a UML diagram to depict the whole contents of S-121 MLB Application schema.	
35.	KR	Appendix C C 1. Overview (p.27)	C 1. Overview (para.1)	ge	The part that states the rights, restrictions, and responsibilities need to be accurately depicted can be construed as that this specification (S-121) is intended to have legal effects. This is	“Marine resources maps, fisheries maps, a marine cadaster, political and jurisdictional maps and marine limits and boundaries use concepts of rights, ownership, and legal	

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					clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	aspects. The theme behind some of these additional types of marine data is legal rights, restrictions and responsibilities. These types of marine data therefore need to incorporate and accurately depict rights, restrictions and responsibilities.	
36.	KR	Appendix C C 1. Overview (p.27)	C 1. Overview (para.2, 3)	ge	The part that states the major distinguishing characteristic between S-121 and S-100 is the introduction of the rights, restrictions, responsibilities can be construed as that this specification (S-121) is intended to have legal effects. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"This Appendix describes an Application Schema model for managing legal rights, restrictions and responsibilities within the context of S-100. The high level conceptual model is based on the General Feature Model defined in ISO 19109 and the conceptual model defined in IHO S-100. The model is similar to that defined for any S-100 compliant feature based data model. The major distinguishing characteristic is the introduction of the Rights, Restrictions, Responsibilities and Parties structure derived from the ISO 19152 Land Domain Administrative Model. The conceptual model for managing legal rights, restrictions and responsibilities is described in this Appendix to S-121. S-121 features are shown with class names beginning "S121" followed by the name of the class"	

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37.	KR	Appendix C. Application Schema (p.27)	C2.1. Application Schema General Model	te	The application schema should be designed based on GFM of S-100 4.0.0 and needs to be described clearly for readers of S-121 MLB PS.	Refine the application schema and organize essential parts to be included.	
38.	KR	Appendix C C 2. 1. Application Schema General Model (p.28)	C 2. 1. Application Schema General Model (para.2, 3)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"This allows Rights, Restrictions and Responsibilities to be described and associated to Parties or Group Parties. These may also be sourced. All of the Information types defining rights, restrictions and responsibilities are defined in the S-121 Feature Catalogue."	
39.	KR	Appendix C C 2. 2. Basic Administrative Unit Package (p.28)	C 2. 2. Basic Administrative Unit Package (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General	"The Basic Administrative Unit is an information type to "which (one or more) unique and homogeneous rights, responsibilities or restrictions are associated". This class does not take on spatial attributes itself, but is associated with a FeatureUnit, which corresponds to a feature and has its own spatial attributes. The rights, restrictions and/or responsibilities and parties structure is thus shared through the BasicAdministrativeUnit. That is, a Basic Administrative Unit is an attribute by reference	

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					Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	for a Feature Unit. The BasicAdministrativeBAUnit feature is also a Versioned Object which allows the duration of validity for an object to be described. The BasicAdministrativeUnit is illustrated in Figure C-2.”	
40.	KR	Appendix C C 2. 2. Basic Administrative Unit Package (p.29)	C 2. 2. Basic Administrative Unit Package (para.4, 5)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“The attribute uID is used in relationships between instances of the BasicAdministrativeUnit and —Rights, Restrictions—and/or—Responsibilities—and parties (Party) information objects. The attribute <i>basicAdministrativeUnitContext</i> allows the context for an instance of a BasicAdministrativeUnit to be described. This would include other information that would be included with a logical administrative unit in a legal document. ”	
41.	KR	Appendix C C 2. 3. Feature Unit (p.29)	C 2. 3. Feature Unit (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the	“The class Feature Unit realizes S121_GF_FeatureType. The definition, code and other aspects are recorded in the Feature Concept Dictionary Register. A Feature Unit such as Exclusive Economic Zone would be associated to a BasicAdministrativeUnit information type to take on rights, responsibilities and restrictions and party administrative attributes. ”	

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					consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”		
42.	KR	Appendix C C 2. 3. Feature Unit (p.30)	C 2. 3. Feature Unit (para.3, 4)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“The attribute <i>legalStatusType</i> optionally is used to differentiate between the legal-status of particular features. It makes use of the enumeration <i>legalStatusCodeList</i> . The attribute context optionally describes the legal-or administrative aspects of the feature object.”	
43.	KR	Appendix C C 2. 4. Geometry / Additional Spatial Information (p.31)	C 2. 4. Geometry / Additional Spatial Information (para.2)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include	“S-121 includes additional ways of describing position inherited from the ISO standard 19152. These are the description of a spatial attribute textually called “location by text” and the description of a position in a coordinate reference system different that that used to describe other positions in the same dataset. Both cases occur in real legal -data. A treaty or law may describe a position as “an extension of a line from ...” or by some other descriptive means. Also the reference system used in a treaty or law may be in a coordinate reference	

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					matters involving questions of international politics.”	system that was used at the time the treaty or law was written. Since this textual description or position in a unique coordinate reference system are what is described in the treaty or law they are the correct legal-position and must be included as is in the S-121 data. However, for an implementing production system to work, and for it to be possible to calculate and display geometries it is necessary for all the spatial primitives to be within the same coordinate reference system. A new information type carrying additional legal information has been defined, “AdditionalSpatialInformation”.	
44.	KR	Appendix C C 2. 4. Geometry / Additional Spatial Information (p.31)	C 2. 4. Geometry / Additional Spatial Information (para.5)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“The additional information type AdditionalSpatialInformation contains the additional attributes required to support the legal aspects. ”	
45.	KR	Appendix C C 2. 4. Geometry / Additional Spatial	C 2. 4. Geometry / Additional Spatial Information (para.7)	ge	This specification (S-121) is intended to have a legal effect and to support legal proceedings. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United	“The attribute <i>locationByText</i> allows additional spatial information to be a textual description. This allows locations, limits, zones or spaces that are not fully described geometrically to be included. This is important in some legal cases	

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		Information (p.31)			Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	where only some of the boundaries of a zone may be rigorously described.”	
46.	KR	Appendix C C 2. 4. Geometry / Additional Spatial Information (p.32)	C 2. 4. Geometry / Additional Spatial Information (para.13)	ge	For non-delimited marine areas or cases where information is insufficient or inadequate, this specification (S-121) allows relevant information to be represented in the form of texts rather than visual images. This may cause disputes between states with undetermined delimitation of maritime boundaries.	At the end of paragraph 13, insert the following sentence: <u>“With respect to locationByText, the presence of inconsistencies or discrepancies in information provided by different states does not indicate the existence of a dispute among the relevant states.”</u>	
47.	KR	Appendix C C 2. 4. Geometry / Additional Spatial Information (p.35)	C 2. 4. Geometry / Additional Spatial Information (para.14)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing “technical standards” regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include	“The Basic Administrative Unit (BasicAdministrativeUnit) information type acts as an attribute by association to provide administrative attributes of—Rights, Restrictions or Responsibilities to the Zone and Space features.”	

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					matters involving questions of international politics.”		
48.	KR	Appendix C 2. 4. Geometry / Additional Spatial Information (p.35)	Figure C-7	te	Cannot find feature types for Location, Limit, Zone and Space in the S-121 MLB PS.	Add a UML diagram to depict feature types for Location, Limit, Zone and Space.	
49.		Appendix C C 2. 4. Geometry / Additional Spatial Information (p.36)	C 2. 4. Geometry / Additional Spatial Information (para.16)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“Figure C-9 below shows the Source object with all of the associated enumerations and associated support classes. A set of attributes explicitly describe the information pertinent to source documents within a legal environment .”	
50.	KR	Appendix C C.2.5. Party Unit Package (p.39)	C.2.5. Party Unit Package (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the	“A party is “a person or organization that plays a role in rights. A Party is considered as an object which allows it to be shared. That is, a party may be part of several different rights, responsibilities and restrictions. A Group Party is also a Party that consists of several individual parties. The PartyMember class provides an attribute on the composition attribute that forms a group out of several party members. This optional attribute allows parties	

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					consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	to have different shares within a group. The types of Parties and Group Parties are described by partyType and partyGroupType. Figure C-10 below shows the Party structure.”	
51.	KR	Appendix C C 2. 5. Party Unit Package (p.39)	C 2. 5. Party Unit Package (para.2)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“The relationship between Parties, Group Parties, Rights, Restrictions and Responsibilities and feature instances (BasicAdministrativeUnit) is by named associations.”	
52.	KR	Appendix C C 2. 6. Rights, Responsibilities and Restrictions (RRR) Administrative Package (p.40)	C 2. 6. Rights, Responsibilities and Restrictions (RRR) Administrative Package (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the	“The RRR administrative package associates parties with Basic Administrative Units (BasicAdministrativeUnit). There are three subtypes realised as information types. 1. Right, with rights as instances. Rights are primarily in the legal domain. 2. Responsibility, with responsibilities as instances. 3. Restriction, with restrictions as instances.	

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Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	Restrictions—usually apply to features independent of the rights; that is, the related party can change and the restriction remains.”	
53.	KR	Appendix C C 2. 6. Rights, Responsibilities and Restrictions (RRR) Administrative Package (p.40)	C 2. 6. Rights, Responsibilities and Restrictions (RRR) Administrative Package (para.1, 2, 4)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“Rights, Responsibilities and Restrictions are information types associated by reference to BasicAdministrativeUnit features.” “The code lists that define the rights, responsibilities and restrictions are rightTypeList, responsibilityTypeList, and restrictionTypeList . Enumerations are used, rather than character strings in order to ensure consistency.” “Figure C-11 below shows the S-121 Administrative Rights, Responsibilities and Restrictions.” Delete Figure C-11-S-121 RRR Administrative Package.	
54.	KR	Appendix C C 2. 7. Governance Object (p.40~41)	C 2. 7. Governance Object (para.3)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General	“The attributes are: • <i>govID</i> – A unique character string and a namespace identifier which is also a unique character string; • <i>referenceNumber</i> – The reference number of the legal reference; • <i>label</i> – A short textual identifier of the governance object; • <i>name</i> – The name of the governance object;	

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					Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	<ul style="list-style-type: none"> • <i>governanceTitle</i> – The title of the legal reference; • <i>governanceDescription</i> – A character string containing the governance statement; • <i>releasabilityType</i> – Optionally used to differentiate between releasability status for particular features; • <i>dateApproved</i> – The date at which the legal statement or document was approved by the appropriate governing body; • <i>dateConsidered</i> – The date at which the legal statement or document was considered by the appropriate governing body; • <i>dateIntroduced</i> – The date at which the legal statement or document was introduced." 	
55.		Appendix C C 2. 8. Versioned Object (p.42)	C 2. 8. Versioned Object (para.1)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Versioning is a critical aspect for legal -data. Each feature and information object can be separately versioned. This is done by including two attributes in each of these features that define the beginning and end dates of validity."	
56.	KR	Appendix C C 2. 8. Versioned	C 2. 8. Versioned Object	ge	In cases where there is a discrepancy in the information submitted by two or more countries, this specification (S-121) allows for	At the end of paragraph 3, insert the following sentence:	

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S-121 comments and editorial observations (Korea - Rep of)

Date:	Document: S-121 Draft Edition 1.0.0
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Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
		Object (p.42)	(para.3)		a separate version for each piece of information. This may cause disputes between states with undetermined delimitation of maritime boundaries.	<u>“With respect to versioning, the presence of inconsistencies or discrepancies in information provided by different states does not indicate the existence of a dispute among the relevant states.”</u>	
57.	KR	Appendix C C 2. 9. Implementation Model (p.43)	C 2. 9. Implementation Model (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	“These additional groups are the Administrative Group that defines the Basic Administrative Unit and the Rights, Restrictions and Responsibilities . The Party group defines Parties and the Source Group defines Source references. The governance object is also part of the Administrative Group.”	
58.	KR	Appendix C C 2. 9. Implementation Model (p.43~44)	C 2. 9. Implementation Model (para.2)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the	“The Administrative and Party structure simply behaves as an attribute by association describing the Rights, Responsibilities and Restrictions and the Parties involved for that Feature.”	

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2 Type of comment: ge = general te = technical ed = editorial

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NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."		
59.	KR	Appendix C C 2. 9. Implementation Model (p.44)	C 2. 9. Implementation Model (para.6)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"The S-121 feature would have a pointer to an instance or instances of BasicAdministrativeUnit information types and then to Right, Responsibility and Restriction and Party information types . Selected information from these classes, such as the sovereign right and country, could be converted into an attribute on the feature used in S-101. The S-121 structure addresses the more rigorous legal environment and the digital navigation environment can take what it needs into the S-101 environment."	
60.	KR	Appendix D. Bibliography (p.47)	Entire section	ge	Bibliography in Appendix D should be moved to 1.2 References part.	Move the bibliography of Appendix D to 1.2 part according the standard template for S-100 based PS.	
61.	KR	Annex A/ 2 Feature Types (p.2)	Figure 1-MLB Features	ge	Impossible to review due to low resolution.	Replace the existing figure to a clearer one.	

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Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
62.	KR	Annex A/ 2 Feature Types – Note (p.7)	2 Feature Types – Note (para. 1)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	<p>"Note: Four of the feature types already have definitions in the Feature Concept Dictionary Register of the IHO Geospatial Information (GI) Registry. They have the stereotype <HYDRO>. These are: Territorial Sea Area, Contiguous Zone, Exclusive Economic Zone and Continental Shelf Area. These are cases where context is important. In the navigational context these features are shown to inform a navigator since it may have impact upon the rules of passage.</p> <p>However in the Maritime Limits and Boundaries context these features may carry a legal status as part of a treaty or declaration of a nation's sovereign boundary. The definitions of the features Territorial Sea Area, Contiguous Zone, Exclusive Economic Zone and Continental Shelf Area must be that as given in UNCLOS.</p>	
63.	KR	Annex A/ 2 Feature Types – Note (p. 8)	2 Feature Types – Note (para. 2)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include	<p>"In the eNavigation context the MLB feature types should be referenced, or four parallel feature types should exist under the <HYDRO> stereotype in the Feature Concept Dictionary which indicate that they are derived from the four MLB feature types that have the full UNCLOS definitions and permit the full set of attributes allowed in S-121 including the Right, Restriction, Responsibility and Party attributes established by reference through Information Objects."</p>	

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Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					matters involving questions of international politics.”		
64.	KR	Annex A/ 3 Attribute Types (p.8)	3 Attribute Types (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“The Rights, Restrictions, Responsibility and Party structure effectively provides attributes to the S-121 feature types by reference.”	
65.	KR	Annex A/ 3 Attribute Types (p.9)	3 Attribute Types (para.7, 9)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“legalStatusType:— This attribute used to differentiate between the legal status of particular features. context:This attribute describes the legal or administrative aspects of the feature object.”	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
66.	KR	Annex A/ 4 S121 Location Feature Objects (p.15)	4.1 S121 Location Feature Objects	te	There are no contents of Primitive, attribute binding of Feature type, Information type, Feature/Information association in the existing DCEG. The DCEG should be written in the standard template of S-100 Part 11.	Rewrite the DCEG in accordance with the template and provide it for review by experts.	
67.	KR	Annex A/ 4.2.10 Boundary (p.21)	Reference, Remarks	ge	In accordance with articles 74, 75, 83, and 84 of UNCLOS, information on maritime boundaries, such as information about the delimitation of exclusive economic zones and continental shelves between states, may be provided for S-121 only when an agreement is reached between relevant states.	At the Reference section, insert the following phrase: “ UNCLOS: Article 74, 75, 83, 84 ” At the Remarks section, insert the following sentence: “In accordance with articles 74, 75, 83, and 84 of UNCLOS, information on maritime boundaries, such as information about the delimitation of exclusive economic zones and continental shelves between states, may be provided for S-121 only when an agreement is reached between relevant states.”	
68.	KR	Annex A/ 4.5.5 Overlap Zone (p.34)	4.5.5 Overlap Zone	ge	This specification (S-121) includes politically-sensitive Overlap Zone. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and	“ 4.5.5 Overlap Zone. Item Type: Feature Proposal Type: Retirement Domain: MLB AlphaCode: OVRZNE Name: Overlap Zone Alias: MA_OverlapZone ”	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	<p>CamelCase: OverlapZone</p> <p>Use Type: Administrative</p> <p>Definition: A "Zone" were the rights of more than one "Party" overlaps or are shared.</p> <p>Reference:</p> <p>Definition Source:</p> <p>Similarity to Source:</p> <p>Int1:</p> <p>S4:</p> <p>Recommended Attributes: zoneObjectType, jurisdictionalDomain, label, name, context and releasabilityType, beginLifespanVersion, endLifespanVersion, collection</p> <p>Distinguishing Features:</p> <p>"ArchipelagicWater", "TerritorialSea", "ContiguousZone", "ExclusiveEconomicZone", "ContinentalShelf", "TheArea", "Roadstead", "HighSea"</p> <p>Remarks:</p> <p>Permitted Primitives: A"</p>	
69.	KR	Annex A/ 4.5.6 Joint Management Zone (p.34)	4.5.6 Joint Management Zone	ge	This specification (S-121) includes politically-sensitive Joint Management Zone. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of	<p>4.5.6 Joint Management Zone.</p> <p>Item Type: Feature</p> <p>Proposal Type: Retirement</p> <p>Domain: MLB</p> <p>AlphaCode: JMGZNE</p> <p>Name: Joint Management Zone</p> <p>Alias: MA_JointManagementZone</p>	

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NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	<p>CamelCase: JointManagementZone Use Type: Administrative Definition: An area of agreed joint management between several States. Reference: Definition Source: Similarity to Source: Int1: S4: Recommended Attributes: zoneObjectType, jurisdictionalDomain, label, name, context and releasabilityType, beginLifespanVersion, endLifespanVersion, collection Distinguishing Features: "ArchipelagicWater", "TerritorialSea", "ContiguousZone", "ExclusiveEconomicZone", "ContinentalShelf", "TheArea", "Roadstead" Remarks: Permitted Primitives: A"</p>	
70.	KR	Annex A/ 4.6.1 Basic Administrative Unit (p.36)	4.6.1 Basic Administrative Unit (table.1- Definition)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General	“An information object to which (one or more) unique and homogeneous "Right", "Responsibility" or "Restriction" are associated . It is an information object since it does not directly take on spatial attributes.”	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."		
71.	KR	Annex A/ 4.6.2 Right (p.36)	4.6.2 Right	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	<p>4.6.2 Right. Item Type: Information Domain: MLB AlphaCode: MARGHT Name: Right Alias: MA_Right CamelCase: right Definition: An action, activity or class of actions that a system participant may perform on or using an associated resource. Reference: ISO 19152 Definition Source: ISO 19152:2012 clause 4.1.2 Similarity to Source: specialization Int1: S4: Remarks: Realized from ISO 19152 LADM "LA_Right" which stereotypes this object as a "featureType". Since it is not a feature in the same sense as the term feature is used in IHO S100, the stereotype has been removed. For the S121 code lists have been specialized to the marine environment. They can be referenced as objects from the attributes associated with an S100 Feature Object. Used in this way an information object such as an "Right" is a shared attribute by reference.</p>	

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NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
72.	KR	Annex A/ 4.6.3 Responsibility (p.36)	4.6.3 Responsibility	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"4.6.3 Responsibility. Item Type: Information Domain: MLB AlphaCode: MARSPN Name: Responsibility Alias: MA_Responsibility CamelCase: responsibility Definition: A formal or informal obligation to do something. Reference: ISO 19152 Definition Source: ISO 19152:2012 clause 6.4.5 Similarity to Source: specialization Int1: S4: Remarks: Realized from ISO 19152 LADM "LA_Responsibility" which stereotypes this object as a "featureType". Since it is not a feature in the same sense as the term feature is used in IHO S100, the stereotype has been removed. For the S121 code lists have been specialized to the marine environment. They can be referenced as objects from the attributes associated with an S100 Feature Object. Used in this way an information object such as an "Responsibility" is a shared attribute by reference."	
73.	KR	Annex A/ 4.6.4 Restriction (p.37)	4.6.4 Restriction	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of	"4.6.4 Restriction. Item Type: Information Domain: MLB AlphaCode: MARSTN Name: Restriction Alias: MA_Restriction"	

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Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	CamelCase: restriction Definition: A formal or informal entitlement to refrain from doing something. Reference: ISO 19152 Definition Source: ISO 19152:2012 clause 6.4.4 Similarity to Source: specialization Int1: S4: Remarks: Realized from ISO 19152 LADM "LA_Restriction" which stereotypes this object as a "featureType". Since it is not a feature in the same sense as the term feature is used in IHO S100, the stereotype has been removed. For the S121 code lists have been specialized to the marine environment. They can be referenced as objects from the attributes associated with an S100 Feature Object. Used in this way an information object such as an "Restriction" is a shared attribute by reference. Out of the RRR objects, it is the only one that does not require a relation with Party, since restrictions can apply to all."	
74.	KR	Annex A/ 4.6.7 Source (p.38)	4.6.7 Source (Definition)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the	"Definition: Descriptive documentation that supports, complement or describes the associated object. Document providing legal and/or administrative facts on which the right, restriction, responsibility , basic administrative unit, party, or spatial unit is based."	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."		
75.	KR	Annex A/ 4.6.8 Governance (p.39)	4.6.8 Governance (Remarks)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	<p>"Definition: A description of the legal context information from a proclamation, law or treaty document.</p> <p>Remarks: Governance information defines title, reference number, date and other associated information linked to the particular proclamation, law and treaty documents to support the provision of specific description or interpretation that is applicable to the selected set of features. A governance object should contain all of the required legal text."</p>	
76.	KR	Annex A/ 4.7.3 Legal Status Type (p.40)	4.7.3 Legal Status Type	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include	<p>"4.7.3 Legal Status Type Item Type: Simple Attribute Domain: MLB AlphaCode: MALGST Name: Legal Status Type Alias: MA_LegalStatusType CamelCase: legalStatusType Data Type: Legal Status Type List Definition: This attribute used to differentiate between the legal status of particular features.</p>	

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Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					matters involving questions of international politics.”	Reference: Definition-Source: Similarity to Source: Int1: S4: Remarks: Quantity Specifications:”	
77.	KR	Annex A/ 4.7.4 Context (p.40)	4.7.4 Context	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“Definition: This attribute describes the legal or administrative aspects of the feature object.”	
78.	KR	Annex A/ 4.7.9 Reference Number (p.42)	4.7.9 Reference Number (Definition)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General	“Definition: An attribute describing the reference number of the legal -reference.”	

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NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."		
79.	KR	Annex A/ 4.7.10 Governance Title (p.42)	4.7.10 Governance Title (Definition)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Definition: The title of the legal reference."	
80.	KR	Annex A/ 4.7.11 Governance Description (p.43)	4.7.11 Governance Description (Remarks)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Remarks: This attribute contains the block or blocks of legal text that often acts as a preamble to a proclamation, treaty or other legal document. "	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
81.	KR	Annex A/ 4.7.12 Date Approved (p.43)	4.7.12 Date Approved (Definition)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Definition: The date at which the legal statement or document was approved by the appropriate governing body."	
82.	KR	Annex A/ 4.7.13 Date Considered (p.43)	4.7.13 Date Considered (Definition)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Definition: The date at which the legal statement or document was considered by the appropriate governing body."	
83.	KR	Annex A/ 4.7.14 Date Introduced (p.43)	4.7.14 Date Introduced (Definition)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly	"Definition: The date at which the legal statement or document was introduced."	

1 CO = Contributing Organisation (HOs should use 2 character codes e.g. FR AU etc.)

2 Type of comment: ge = general te = technical ed = editorial

3 Whilst not compulsory, comments are more likely to be accepted if accompanied by a proposed change.

NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”		
84.	KR	Annex A/ 4.7.18 Right Restriction Responsibility (p.45)	4.7.18 Right Restriction Responsibility	ge ^e	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	<p>“4.7.18 Right Restriction Responsibility</p> <p>Item Type: Simple Attribute</p> <p>Proposal Type:</p> <p>Domain: MLB</p> <p>AlphaCode: MARRRD</p> <p>Name: Right Restriction Responsibility</p> <p>Description</p> <p>Alias: MA_RRRDescription</p> <p>CamelCase: right Restriction Responsibilities</p> <p>Description</p> <p>Data Type:</p> <p>Definition: Description regarding the "Right", "Restriction" or "Responsibility".</p> <p>Reference: ISO 19152</p> <p>Definition Source: ISO 19152:2012 clause 6.4.2</p> <p>Similarity to Source: rstyled</p> <p>Int1:</p> <p>S4:</p> <p>Remarks:</p> <p>Quantity Specifications:”</p>	

1 CO = Contributing Organisation (HOs should use 2 character codes e.g. FR AU etc.)
 2 Type of comment: ge = general te = technical ed = editorial
 3 Whilst not compulsory, comments are more likely to be accepted if accompanied by a proposed change.
NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
85.	KR	Annex A/ 4.7.19 MA Right Restriction Responsibility Share (p.46)	4.7.19 MA Right Restriction Responsibility Share	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"4.7.19 MA Right Restriction Responsibility Share Item Type: Simple Attribute Proposal Type: Domain: MLB AlphaCode: MARSHR Name: Right Restriction Responsibility Share Alias: MA_RRRShare CamelCase: right Restriction Responsibilities Share Data Type: Definition: A share in an instance of a subclass of a Right, Restriction or Responsibility. Reference: ISO 19152 Definition Source: ISO 19152:2012 clause 6.4.2 Similarity to Source: specialization Int1: S4: Remarks: Quantity Specifications:"	
86.	KR	Annex A/ 4.7.20 Right Restriction Responsibility Share check (p.46)	4.7.20 Right Restriction Responsibility Share check	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly	"4.7.20 Right Restriction Responsibility Share Check Item Type: Simple Attribute Proposal Type: Domain: MLB AlphaCode: MARSHC	

1 CO = Contributing Organisation (HOs should use 2 character codes e.g. FR AU etc.)

2 Type of comment: ge = general te = technical ed = editorial

3 Whilst not compulsory, comments are more likely to be accepted if accompanied by a proposed change.

NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	Name: Right Restriction Responsibility Share Check Alias: MA_RRRShareCheck CamelCase: rightRestrictionResponsibilitiesShareCheck Data Type: Definition: Boolean indicating whether the constraint is applicable. Reference: ISO 19152 Definition Source: ISO 19152:2012 clause 6.4.2 Similarity to Source: specialization Int1: S4: Remarks: Quantity Specifications:”	
87.	KR	Annex A/ 4.7.21 Right Restriction Responsibility Time Specification (p.46)	4.7.21 Right Restriction Responsibility Time Specification	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include	“4.7.21 Right Restriction Responsibility Time Specification Item Type: Simple Attribute Proposal Type: Domain: MLB AlphaCode: MARRRT Name: Right Restriction Responsibility Time Specification Alias: MA_RRRtimeSpec CamelCase: rightRestrictionResponsibilitiesTimeSpec Data Type:	

1 CO = Contributing Organisation (HOs should use 2 character codes e.g. FR AU etc.)

2 Type of comment: ge = general te = technical ed = editorial

3 Whilst not compulsory, comments are more likely to be accepted if accompanied by a proposed change.

NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					matters involving questions of international politics.”	<p>Definition: Operational use of a right in time sharing.</p> <p>Reference: ISO 19152</p> <p>Definition Source: ISO 19152:2012 clause 6.4.2</p> <p>Similarity to Source: specialization</p> <p>Int1:”</p>	
88.	KR	Annex A/ 4.7.22 Right Type (p.47)	4.7.22 Right Type	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	<p>“4.7.22 Right Type</p> <p>Item Type: Simple Attribute</p> <p>Proposal Type:</p> <p>Domain: MLB</p> <p>AlphaCode: MARIGT</p> <p>Name: Right Type</p> <p>Alias: MA_RightType</p> <p>CamelCase: rightType</p> <p>Data Type:</p> <p>Definition: The type of the right.</p> <p>Reference: ISO 19152</p> <p>Definition Source: ISO 19152:2012 clause 6.4.3</p> <p>Similarity to Source: specialization</p> <p>Int1:</p> <p>S4:</p> <p>Remarks:</p> <p>Quantity Specifications:”</p>	

1 CO = Contributing Organisation (HOs should use 2 character codes e.g. FR AU etc.)

2 Type of comment: ge = general te = technical ed = editorial

3 Whilst not compulsory, comments are more likely to be accepted if accompanied by a proposed change.

NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
89.	KR	Annex A/ 4.7.23 Responsibility Type (p.47)	4.7.23 Responsibility Type	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	<p>4.7.23 Responsibility Type Item Type: Simple Attribute Proposal Type: Domain: MLB AlphaCode: MAREST Name: Responsibility Type Alias: MA_ResponsibilityType CamelCase: responsibilityType Data Type: Definition: The type of the responsibility. Reference: ISO 19152 Definition Source: ISO 19152:2012 clause 6.4.5 Similarity to Source:specialization Int1: S4: Remarks: Quantity Specifications:"</p>	
90.	KR	Annex A/ 4.7.24 Restriction Type (p.47)	4.7.24 Restriction Type	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO	<p>4.7.24 Restriction Type Item Type: Simple Attribute Proposal Type: Domain: MLB AlphaCode: MARSTT Name: Restriction Type Alias: MA_RestrictionType CamelCase: restrictionType</p>	

1 CO = Contributing Organisation (HOs should use 2 character codes e.g. FR AU etc.)

2 Type of comment: ge = general te = technical ed = editorial

3 Whilst not compulsory, comments are more likely to be accepted if accompanied by a proposed change.

NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					(Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	<p>Data Type:</p> <p>Definition: The type of the restriction.</p> <p>Reference: ISO 19152</p> <p>Definition Source: ISO 19152:2012 clause 6.4.9</p> <p>Similarity to Source: specialization</p> <p>Int1:</p> <p>S4:</p> <p>Remarks:</p> <p>Quantity Specifications:"</p>	
91.	KR	Annex A/ 4.7.32 Official Location (p.50~51)	4.7.32 Official Location (Remarks)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Remarks: This is the legal -description of the point in a textual form, so that the exact representation of the point may be maintained in terms of degrees and decimal degrees, or degrees, minutes and seconds, or other description. A reference system (CRS) shall be included where available. A CRS is required, but it may only be included in the base legal -text and therefore only included by reference through a Source object."	
92.	KR	Annex A/ 4.9.1 Location Type List (p.71)	4.9.1 Location Type List (Definition, Remarks)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the	"Definition: This code list describes categories of "LocationType" that have a common characteristic related to the legal and administrative aspects of the marine environment. In effect this list consist of all	

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2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

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NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	S121 features under the location type classes.. Remarks: The code list is registered in the Feature Concept Dictionary as listed values and as such can be expanded to include all aspects of the legal context."	
93.	KR	Annex A/ 4.9.2 Limit Type List (p.71)	4.9.2 Limit Type List (Definition, Remarks)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Definition: This code list describes categories of "LimitType" that have a common characteristic related to the legal and administrative aspects of the marine environment. In effect this list consist of all S121 feature unit limit type classes. Remarks: The code list is registered in the Feature Concept Dictionary as listed values and as such can be expanded to include all aspects of the legal context. "	
94.	KR	Annex A/ 4.9.3 Zone Type List (p.72)	4.9.3 Zone Type List (Definition, Remarks)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include	"Definition: This code list describes categories of "ZoneType" that have a common characteristic related to the legal —and administrative aspects of the marine environment. In effect this list consist of all S121 feature unit zone type classes. Remarks: The code list is registered in the Feature Concept Dictionary as listed values and as such can be expanded to include all aspects of the legal -context."	

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NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					matters involving questions of international politics.”		
95.	KR	Annex A/ 4.9.4 Space Type List (p.72)	4.9.4 Space Type List (Definition, Remarks)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“Definition: This code list describes categories of "SpaceType" that have a common characteristic related to the legal and administrative aspects of the marine environment. In effect this list consist of all S121 feature unit space type classes. Remarks: The code list is registered in the Feature Concept Dictionary as listed values and as such can be expanded to include all aspects of the legal -context.”	
96.	KR	Annex A/ 4.9.5 Legal Status Type List (p.72)	4.9.5 Legal Status Type List	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“ 4.9.5 Legal-Status-Type-List Item-Type: Code-List Domain: MLB Associated Attribute: legalStatusType Name: Legal-Status-Type-List Alias: MA_LegalStatusTypeList CamelCase: legalStatusTypeList Code-List-Type: Open-EnumerationA URI: Encoding: Definition: A list of value providing a legislative status for the "FeatureUnit" described. Reference: Definition-Source:	

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2 Type of comment: ge = general te = technical ed = editorial

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NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
						Similarity to Source: Int1: S4: Remarks:"	
97.	KR	Annex A/ 4.9.14 Legal Status Type List (p.76)	4.9.14 Legal Status Type List	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"4.9.14 Legal Status Type List Item Type: Code List Domain: MLB Associated Attribute: legalStatusType Name: Legal Status Type List Alias: MA_LegalStatusTypeList CamelCase: legalStatusTypeList Code List Type: Open Enumeration URI: Encoding: Definition: A list of values providing a legislative status for the "FeatureUnit" described. Reference: Definition Source: Similarity to Source: Int1: S4: Remarks:"	
98.	KR	Annex A/ 4.9.15 Restriction Type List (p.76)	4.9.15 Restriction Type List	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of	"4.9.15 Restriction Type List Item Type: Code List Domain: MLB Associated Attribute: restrictionType	

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2 Type of comment: ge = general te = technical ed = editorial

3 Whilst not compulsory, comments are more likely to be accepted if accompanied by a proposed change.

NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	<p>Name: Restriction Type List Alias: MA_RestrictionTypeList CamelCase: restrictionTypeList Code List Type: open enumeration URI: Encoding: Definition: Category of "restrictionType" Reference: ISO 19152 Definition Source: ISO 19152:2012 clause 6.4.9 Similarity to Source: specialization Int1: S4: Remarks: The code list includes: "timeBasedRestriction", "passageRestriction", "accessRestriction", "jurisdictionRestriction", "resourceRestriction".</p>	
99.	KR	Annex A/ 4.9.16 Right Type List (p.76~77)	4.9.16 Right Type List	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General	<p>"4.9.16 Right Type List Item Type: Code List Domain: MLB Name: Right Type List Alias: MA_RightTypeList CamelCase: rightTypeList Code List Type: open enumeration URI: Encoding: Definition: Category of "rightType"</p>	

1 CO = Contributing Organisation (HOs should use 2 character codes e.g. FR AU etc.)

2 Type of comment: ge = general te = technical ed = editorial

3 Whilst not compulsory, comments are more likely to be accepted if accompanied by a proposed change.

NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	<p>Reference:</p> <p>Definition-Source:</p> <p>Similarity to Source:</p> <p>Int1:</p> <p>S4:</p> <p>Remarks: The code list includes: "sovereignty", "sovereignRight", "accessRight", "harvestRight", "easementRight".</p>	
100.	KR	Annex A/ 4.9.17 Responsibility Type List (p.77)	4.9.17 Responsibility Type List	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	<p>4.9.17 Responsibility Type List</p> <p>Item Type: Code List</p> <p>Domain: MLB</p> <p>Associated Attribute: responsibilityType</p> <p>Name: Responsibility Type List</p> <p>Alias: MA_ResponsibilityTypeList</p> <p>CamelCase: responsibilityTypeList</p> <p>Code List Type: open enumeration</p> <p>URI:</p> <p>Encoding:</p> <p>Definition: Category of "responsibilityType".</p> <p>Reference:</p> <p>Definition-Source:</p> <p>Similarity to Source:</p> <p>Int1:</p> <p>S4:</p> <p>Remarks:</p>	
101.	KR	Annex A/	4.10.1 Legal Status Type List	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope	Delete 4.10.1 Legal Status Type List	

1 CO = Contributing Organisation (HOs should use 2 character codes e.g. FR AU etc.)

2 Type of comment: ge = general te = technical ed = editorial

3 Whilst not compulsory, comments are more likely to be accepted if accompanied by a proposed change.

NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
		4.10.1 Legal Status Type List (p.80~81)			of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	Delete table 4.10.1.1 Lodged Delete table 4.10.1.2 Signed Delete table 4.10.1.3 Proposed Delete table 4.10.1.4 Predicated Delete table 4.10.1.5 Development Delete table 4.10.1.6 In force	
102.	KR	Annex A/ 4.10.17 Restriction Type List (p.104~106)	4.10.17 Restriction Type List	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	Delete 4.10.17 Restriction Type List Delete table 4.10.17.1 Access Restriction Delete table 4.10.17.2 Jurisdiction Restriction Delete table 4.10.17.3 Passage Restriction Delete table 4.10.17.4 Resource Restriction Delete table 4.10.17.5 Time Based Restriction Delete table 4.10.17.6 Use Restriction	
103.	KR	Annex A/ 4.10.18 Right Type List (p.106~108)	4.10.18 Right Type List	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of	Delete 4.10.18 Right Type List Delete table 4.10.18.1 Sovereignty Delete table 4.10.18.2 Sovereign Right	

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2 Type of comment: ge = general te = technical ed = editorial

3 Whilst not compulsory, comments are more likely to be accepted if accompanied by a proposed change.

NOTE Columns 1, 2, 4, 5 are compulsory.

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	Delete table 4.10.18.3 Access Right Delete table 4.10.18.4 Easement Right Delete table 4.10.18.5 Harvest Right Delete table 4.10.18.6 Contiguous Right	
104.	KR	Annex A/ 4.10.19 Responsibility Type List (p.108)	4.10.19 Responsibility Type List	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	Delete 4.10.19 Responsibility Type List Delete table 4.10.19.1 Maintenance Responsibility	
105.	KR	Annex B/ Data Product Format (Encoding)	Entire section	te	There was no encoding standard for printing purpose in S-100 and it is newly introduced in S-121 for Use case 2 purpose. Therefore, S-	Propose that S-100WG discuss the new encoding before inclusion in the S-121 MLB PS.	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					100WG should review this new encoding standard.		
106.	KR	Annex B/ 1 Introduction (p.1)	1 Introduction (para.2)	ge	One of the purposes of this specification (S-121) is supporting the legal descriptions of maritime boundaries that can easily be presented in a court or other legal venue. This is clearly beyond the scope of the development of "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradictory to the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and in violation of Article 1 of the General Regulations of the IHO, which states that "[t]he activities of the [IHO] . . . do not include matters involving questions of international politics."	"Encoding is extremely important for S-121 Marine Limits and Boundaries because one of the primary uses of the data is in support of the legal description of states sovereign boundaries . As such MLB data must be easily readable in an official or judicial environment ."	
107.	KR	Annex B/ 2 Use Cases (p.1)	2 Use Cases (para.2) 1) Production Dataset	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"1) Production Dataset – An approved dated dataset of MLB data for use in the production of other data products, such as Electronic Nautical Chart, Raster Nautical Chart, or Additional Military Layers. Approved objects from these datasets may be included in other products. For example, a Territorial Sea Outer Limit object may be extracted from a MLB dataset and included as an object in another S-100] based data set, such as an S-101 ENC. In such cases, the legally approved S-121 defined MLB data would serve as the source for the object."	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
108.	KR	Annex B/ 2 Use Cases (p.1~2)	2 Use Cases (para.5) : 2) Legal Declaration Data	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"2) Legal Declaration Data — An official or unofficial legal declaration of MLB object(s) extracted directly from the administration environment at a specific date and time. Its usage may be limited depending on the implementation policies associated with the state's governance procedures. This dataset is a human and computer readable file formatted to contain all elements to be considered a valid legal declaration. Such a dataset can be used to support a state to create, manage and update official legal declarations defining MLB objects and can be used to deposit data with the United Nations (UN)."	
109.	KR	Annex B/ 2 Use Cases (p.2)	2 Use Cases (para.6) : 2) Legal Declaration Data	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"The output format required to support a legal declaration must be explicit and easy to read by non-technical experts in a judicial , administrative or other similar environments and able to be used to support deposit with the Division for Ocean Affairs and the Law of the Sea (DOALOS) of the Office of Legal Affairs in the UN or to make a legal proclamation in a state. The output needs to look closely like the information that is printed in treaties or national laws. This output must be textual so that there are no barriers to its understanding. It also needs to be simple."	
110.	KR	Annex B/ 3 Output Formats	3 Output Formats (para.2)	ge	One of the purposes of this specification (S-121) is to provide legal descriptions of maritime boundaries that can easily be presented in courts or other legal venues. This	"This document provides more detail for the second Use Case of defining an Explicit Text Format that is simple and easy to interpret in an official or judicial environment or to be used	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
		(p.3)			is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	for deposit of a "List of Geographic Coordinates" to UN/DOALOS. The format allows Locations, Limits (and Boundaries) and Zones with their associated S-100 compliant geometric Points, Curves and Surfaces to be described."	
111.	KR	Annex B/ 3.1.1 Extract (p.3)	3.1.1 Extract (para.4)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"What is extracted from the MLB database is a small subset of the elements and relations that may exist in an S-121 compliant MLB database. When they are used, parameters from the shared attributes by reference (BAUnit, Party, Rights,—Restrictions, Responsibilities , Governance, Source and Versioning) would be collapsed into simple attributes since navigational products such as S-101 do not support attributes by reference through information objects."	
112.	KR	Annex B/ 3.1.2 Layer (p.4)	3.1.2 Layer (para.5)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of	"A MLB based AML layer is also a small subset of the elements and relations that may exist in an S-121 compliant MLB database. Parameters from the shared attributes by reference (BAUnit, Party, Rights,—Restrictions,	

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Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	Responsibilities , Governance, Source and Versioning) would be collapsed into simple attributes."	
113.	KR	Annex B/ 3.1.3 System Dependant Exchange File (p.5)	3.1.3 System Dependant Exchange File (para.3)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"A generic GML schema for S-121 would not support shared attributes by reference as is used to describe the information objects in S-121 (Party, Rights, Restrictions, Responsibilities , Governance, Source and Versioning). "	
114.	KR	Annex B/ 3.2 Use Case 2 Legal	3.2 Use Case 2 Legal Declaration Data Format	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly	"MLB data that is output for (i) deposit with the UN/DOALOS or (ii) output by a nation state to mirror their legal proclamations . It needs to be in an explicit and easy to read textual format. Such data also needs to be structured	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
		Declaration Data Format (p.5)	(para.1)		resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	sufficiently to ensure compatibility among the geographic information system, electronic nautical charts and other computer systems. This implies the inclusion of some delimiters. The output for deposit with the UN/DOALOS needs to contain all the information required by the 1982 UN Convention on the Law of the Sea for deposit of straight and archipelagic baselines as well as the outer limits of the territorial sea, the exclusive economic zone and the continental shelf including the extended continental shelf beyond 200 Miles. The output that corresponds to a proclamation from a nation state needs to look closely like the information that is printed in treaties or national laws. That content will be decided by the nation state.”	
115.	KR	Annex B/ 3.2.1 Explicit Textual Format for Deposit with UN/DOALOS (p.5)	3.2.1 Explicit Textual Format for Deposit with UN/DOALOS (para.2)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“All other representations are derived from the legal specification and may contain errors or translation inaccuracies. Defining a common geodetic datum WGS8411 or another world wide reference system is recommended.”	
116.	KR	Annex B/	3.2.1 Explicit Textual Format	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and	“The “RightsRestrictionsResponsibilities” and “Party” and “GroupParty” information objects are effectively shared attributes by reference	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
		3.2.1 Explicit Textual Format for Deposit with UN/DOALOS (p.6)	for Deposit with UN/DOALOS (para.5)		responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	in the S-121 information schema."	
117.	KR	Annex B/ 3.3 Use Case 3 General Public Release Data Format (p.7)	3.3 Use Case 3 General Public Release Data Format (para.3)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"When they are used parameters from the shared attributes by reference (BAUnit, Party, Rights, Restrictions, Responsibilities, Governance, Source and Versioning) would be collapsed into simple attributes."	
118.	KR	Annex B/ 5.1 Explicit Text	5 Explicit Text Encoding Format	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the	"The third aspect of the Explicit Text Encoding Format is a profile that defines which elements are required and which are optional for a particular usage. The profile also establishes	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
		Encoding Structure (p.14)	(para.4)		2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	the text strings used as Block Descriptors and Record Identifiers. The profile given in Appendix D is for deposit with the UN. A nation may create a separate profile for the documentation of legal instruments or other purposes.”	
119.	KR	Annex B/ 5.2 Cross referencing (p.15)	5.2 Cross referencing (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“Some information such as source statements, parties, rights, restrictions and responsibilities can be reused by a number of information objects. This is one of the powerful features of the S-121 model. However, cross referencing is difficult to follow in printed text and should be used sparingly.”	
120.	KR	Annex B/ 5.2 Cross referencing (p.15)	5.2 Cross referencing (para.3)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the	“In practise it is best to use names where they are meaningful. Names work well for the Party, Right, Restriction, Responsibility and Basic Administrative Unit information object. Source and feature and geometry elements work best with Oid pointers. For example, an attribute for a Right information object might point to a right	

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Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	information object that was named "Sovereign Right". The information object named "Sovereign Right" may provide details on Sovereign Right. The pointer would read as: Right: Sovereign Right"	
121.	KR	Annex B/ 5.5 Information Elements (p.28)	5.5 Information Elements (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"The Administrative group contains five classes, Governance, BasicAdministrativeUnit, Responsibilities, and Restrictions. Rights. The party group contains two classes Party and Party Member. The Source group contains one class, Source. Together this is sixteen classes. Each class is represented by a block type. Together with metadata this is seventeen block types. The following subsections list each block type together with the allowed attributes and their definitions."	
122.	KR	Annex B/ 5.5.2 Governance Block (p.30)	5.5.2 Governance Block (para.1)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO	"The second block of data in the S121 Explicit Text Format is the Governance Block. The S121 Governance objects carry the high level information that describe the context of the dataset. Governance information is a specialized type of metadata that is in excess of the metadata defined to allow discovery and	

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Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					(Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	interpretation of a dataset. The governance information is the preamble to the “list of points” that forms the body of the data submitted. It is often the legal title, legal reference number and legal preamble text to a set of data.	
123.	KR	Annex B/ 5.5.3 Basic Administrative Unit Block (p.31)	5.5.3 Basic Administrative Unit Block (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing “technical standards” regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“The central element of the S121 model is the Basic Administrative Unit element. It is the interface point into the administrative structure of S121 Marine Limit and Boundary data. It contains references to Party and Source attributes by reference and Rights, Restrictions, Responsibility attributes. In the general S121 schema the Rights, Restrictions, and Responsibility attributes are also handled as attributes by reference; however to simplify the Explicit Text Format the Rights, Restrictions, and Responsibility attribute information, maybe collapsed into simple attributes of the Basic Administrative Unit.”	
124.	KR	Annex B/ 5.5.4 Rights Restrictions and Responsibilities Blocks (p.31)	5.5.4 Rights Restrictions and Responsibilities Blocks (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing “technical standards” regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO	“5.5.4 Rights Restrictions and Responsibilities Blocks The Right, Restriction and Responsibility objects carry the descriptions of the right, restriction and responsibility attributes. These are shared attributes through referencing.”	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					(Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”		
125.	KR	Annex B/ 5.5.4.1 Rights Block (p.31)	5.5.4.1 Rights Block	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“5.5.4.1 Rights Block An S121_Right is an action, activity or class of actions that a system participant may perform on or using an associated resource. The RightsBlock describes a right.”	
126.	KR	Annex B/ 5.5.4.1 Restrictions Block (p.32)	5.5.4.1 Restrictions Block	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO	“5.5.4.1 Restrictions Block An S121_Restriction is a formal or informal entitlement to refrain from doing something. The RestrictionBlock describes a restriction.”	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					(Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”		
127.	KR	Annex B/ 5.5.4.2 Responsibilities Block (p.32)	5.5.4.2 Responsibilities Block	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“5.5.4.2 Responsibilities Block An S121_Responsibility is a formal or informal obligation to do something. The ResponsibilityBlock describes a responsibility.”	
128.	KR	Annex B/ Appendix A. Implementation Schema (Normative) (p.39)	Appendix A. Implementation Schema (Normative) (para.5)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that	“These are the description of a spatial attribute textually called “location by text” and the description of a position in a coordinate reference system different that that used to describe other positions. Both cases occur in real legal-data . In order to ensure that the spatial information complies with S-100 an additional attribute class has been defined to carry the additional spatial attributes.”	

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					"[t]he activities of the [IHO]...do not include matters involving questions of international politics."		
129.	KR	Annex B/ Appendix A. Implementati on Schema (Normative) (p.48)	Appendix A. Implementation Schema (Normative) (para.14)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Each of the Rights,—Restrictions—and Responsibilities classes are treated separately. This is shown in Figures A10, A11 and A12. The MA_RRRshare attribute is shown as a Fraction data type and MA_RRRshareCheck is shown as Boolean. The fraction and Boolean also need to be represented as character string elements."	
130.	KR	Annex F/ Derivation of Classes	Entire section	te	Need to discuss the need of classes derivation part.	Propose that S-100WG discuss the part of classes derivation before inclusion in the S-121 MLB PS.	
131.	KR	Annex F/ Overview (p. iv)	Overview (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the	"Overview S-121 is a Product Specification for Marine Limits and Boundaries which is built upon both the IHO S-100 Universal Hydrographic Model standard and the ISO TC211 Geographic Information suite of standards, including the ISO 19152 Land Administrative Domain Model. S-121 inherits the capability to describe the legal rights, restrictions and	

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					consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	responsibilities and associated parties from the ISO standards."	
132.	KR	Annex F/ 1 Introduction (p. iv)	1 Introduction	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"1 Introduction This document describes the derivation of classes used in the S-121 Marine Limits and Boundaries Product Specification. S-121 is based on the IHO S-100 Universal Hydrographic Data Model and the ISO TC211 suite of Geographic Information Standards. In order to support the legal attributes source referencing and versioning, S-121 also inherits objects used to define Rights, Responsibilities and Restrictions , Parties and Source structures from the ISO 19152 standard Land Administrative Domain Model."	
133.	KR	Annex F/ 2 Managing Legal Rights (p.1)	2 Managing Legal Rights (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the	"2 Managing Legal Rights The Land Administrative Domain Model (LADM) standardized in ISO standard 19152 establishes a rigorous mechanism for handling legal Rights, Responsibilities and Restrictions (RRR) for individuals, groups or other parties. This mechanism can be used in the IHO standard S-121 Marine Limits and Boundaries and in other marine application areas such as	

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					consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	a Marine Cadaster. The title of the ISO standard says “Land Administrative Domain Model” however the scope of the ISO standard says “including those over water and land, and elements above and below the surface of the earth” ¹ (1 International Standard ISO 19152:2012 Geographic information -- Land Administration Domain Model (LADM), Clause 1 https://www.iso.org/obp/ui/#iso:std:51206:en)”	
134.	KR	Annex F/ 2 Managing Legal Rights (p.1)	2 Managing Legal Rights (para.2)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“This document outlines how Maritime Limits and Boundaries and other marine application areas can be handled in alignment with the RRR and Party structures inherited from ISO 19152. The goal of the Universal Hydrographic Data Model defined in S-100 is to cover all aspects of hydrographic and marine information. In the land domain there are also new structures being standardized in ISO and other forums, to address areas such as land cadaster, land cover, etc. Integrating other information domains for the marine environment that include legal , economic and management aspects related to the ocean can build upon this work in ISO.”	
135.	KR	Annex F/ 2 Managing Legal Rights (p.1)	2 Managing Legal Rights (para.3)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the	“It is very important for associated legal attributes to be used together with Maritime Limit and Boundary (MLB) information so that one can determine under whose authority, or international treaty a particular limit or boundary is defined. Similar processes of defining MLBs exist in many countries;	

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					consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	however, they are not exactly the same so that there may be differences in how information is defined in various jurisdictions. The IHO standard S-121 on Maritime Limits and Boundaries must be general enough to satisfy the requirements of all nations since boundary information involves more than one state actor. Accurate calculation and representation of the resultant boundaries and documentation of the original legal -sources are of great importance. There can be significant legal—and political implications resulting from errors.”	
136.	KR	Annex F/ 2 Managing Legal Rights (p.1)	2 Managing Legal Rights (para.4)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“Maritime Limits and Boundaries information may be used in many different ways. Because there may be several different state actors involved with different technological approaches and levels of sophistication in their system implementations, the management of legal rights needs to be very flexible. This document describes the structure upon which a Product Specifications such as Marine Limits and Boundaries will be based, since all information found within the extensions depends upon the legal and administrative entities described here.”	
137.	KR	Annex F/ 3 Features and Attributes in S-121	3 Features and Attributes in S-121 (para.3)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding	“An information objects can have thematic attributes and so they can be used to implement the Administrative Objects that describe Rights,—Restrictions—and Responsibilities and Parties derived from the ISO 19152. Administrative Objects are real	

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		(p.2)			deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	objects but they have no geographic spatial position."	
138.	KR	Annex F/ 3 Features and Attributes in S-121 (p.2)	3 Features and Attributes in S-121 (para.5)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"S-121 includes additional ways of describing position inherited from the ISO standard 19152. These are the description of a spatial attribute textually called "location by text" and the description of a position in a coordinate reference system different that that used to describe other positions. Both cases occur in real legal data. A treaty or law may describe a position as "an extension of a line from ..." or by some other descriptive means. Also the reference system used in a treaty or law may be in a coordinate reference system that was used at the time the treaty or law was written. Since this textual description or position in a unique coordinate reference system are what is described in the treaty or law they are the correct legal position and must be included as is in the S-121 data. However, for a Geographic Information System to work, and for it to be possible to calculate geometries it is necessary for all the spatial attributes to be in the same coordinate reference system. This	

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						means that either the S-100 spatial attribute needs to be extended or a new information object carrying this additional legal information as attributes needs to be defined . In order to maintain compatibility with the other S-100 Data Products an additional spatial information object with attributes is defined called "S-121_additionalSpatialInformationType".	
139.	KR	Annex F/ 3 Features and Attributes in S-121 (p.5)	3 Features and Attributes in S-121 (para.10)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"S100_GF_ThematicAttributeType. The new metaclass S121_GF_ThematicAttributeType supports relationships to the Administrative Structure (Rights, Restrictions and Responsibilities , and Basic Administrative Unit), which is inherited from the ISO 19152 standard."	
140.	KR	Annex F/ 3.1 Feature Catalogue Structure (p.5)	3.1 Feature Catalogue Structure (para. 1)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO	"All named types, features, information objects and attributes have their definitions recorded in a feature concept dictionary. For a particular product specification such as S-121 Maritime Limits and Boundaries, or S-101 Electronic Nautical Chart a set of allowable features and attributes are selected from the Feature	

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					(Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	Concept Dictionary. The attributes that may be used with the features in the context described in the product specification are then bound to the feature. Navigation and legal descriptions are very different contexts so it is natural that different attributes are bound to the features in these different contexts."	
141.	KR	Annex F/ 3.1 Feature Catalogue Structure (p.5~6)	3.1 Feature Catalogue Structure (para. 2)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"The S-121 Product Specification is based on S-100 and uses the same general feature model, attribute structure and spatial schema as is used in S-100. S121 defined features and their direct attributes can be used in other S-100 based products and will work directly. However, in S121 a number of information objects have been defined. These objects carry thematic attributes (as permitted in the S-100 General Feature Model). These objects act as attributes by reference to the S-121 Features; that is, they define a structure for the legal attributes and sources that is referenced by the S-121 Features. In short, the use of information objects to describe the legal attributes and sources avoids the need to define attributes on attributes."	
142.	KR	Annex F/ 3.2 Feature and Attribute Structure (p.7)	3.2 Feature and Attribute Structure (para.2)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General	"For the establishment of the Electronic Nautical Chart (ENC) data product and for specific other data products, the definition of attributes has been guided by a wealth of experience in creating paper navigational charts, and scientific experience in bathymetry, currents, tides etc. However, when one broadens the scope to more general topic areas which IHO intends to cover, such	

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					Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	as Marine Limits and Boundaries, Cadaster, resource management and general spatial data infrastructure, the definition of attributes becomes more involved. There are many ways to describe the same conditions and some consistency is required. This is especially true of attributes that involve legal rights where consistency is very important.”	
143.	KR	Annex F/ 3.2 Feature and Attribute Structure (p.8)	3.2 Feature and Attribute Structure (para.3)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“Experience in this area comes from land administration, and this experience has been documented in the Land Domain Administrative Model (LADM) standardized in ISO. The standard ISO 19152:2012 Geographic information -- Land Administration Domain Model (LADM) “defines a reference Land Administration Domain Model (LADM) covering basic information-related components of land administration (including those over water and land, and elements above and below the surface of the earth)”. The LADM “provides an abstract, conceptual model with four packages related to parties (people and organizations); basic administrative units, rights, responsibilities, and restrictions (ownership rights) ; spatial units (parcels, and the legal space of buildings and utility networks); spatial sources (surveying), and spatial representations (geometry and topology)”.	
144.	KR	Annex F/	3.2 Feature and Attribute Structure	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and	“There is a need for consistency that the LADM parties (people and organizations) and basic administrative units, rights, responsibilities, and restrictions structure	

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		3.2 Feature and Attribute Structure (p.8)	(para.4)		responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	provides. Since the LADM and IHO S-100 are both built on the ISO TC211 suite of Geographic Information standards, these elements are compatible and can be inherited into IHO."	
145.	KR	Annex F/ 3.2 Feature and Attribute Structure (p.8)	3.2 Feature and Attribute Structure (para.5)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Figure 4 illustrates the Domain Administrative Area Classes defined in the ISO 19152 LADM. The basic administrative units (LA_BAUnit) are the basic elements of the legal -attribute structure. They relate to features and attributes (LA_SpatialUnit), which may be defined in several ways. The explicit geometry used is S-100 is compatible. Rights, restrictions and/or responsibilities -(LA_RRR) relate parties (LA_Party) to the basic administrative units (LA_BAUnit). The ISO Domain Administrative Model standard uses the same types (LA_BAUnit) and spatial geometry (LA_SpatialUnit) as all of the other ISO standards, but it adds the rights, restrictions and responsibilities related to parties or groups of parties. The LA_SpatialUnit corresponds to a feature in the ISO 19109 General Feature Model and the	

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						LA_BAUnit is a collection object that allows the expression of the relationships between the Rights, Restrictions, Responsibilities and Parties to the features.”	
146.	KR	Annex F/ 3.2.1 Basic Administrative Unit Package (p.9)	3.2.1 Basic Administrative Unit Package (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“The Basic Administrative Unit as defined for S-121 is derived from the class LA_BAUnit defined in ISO 19152 which relates rights, responsibilities or restrictions to the feature structure. This class is related to the S121_FeatureUnit. S121_BAUnit is a realization of the class S121_ThematicAttributeType. For example a collection of features represented by several S121_FeatureUnit objects may have a relationship to the same set or rights, restrictions and/or responsibilities and parties. It “carries the characteristics” expressed by the administrative structure and relates it to the feature. The S121_BAUnit object also inherits from ISO 19152 VersionedObject. This allows the definition begin and end lifespans for an object and also provides optional quality and source references. This is illustrated in Figure 5.”	
147.	KR	Annex F/ 3.2.1 Basic Administrative Unit Package (p.9)	3.2.1 Basic Administrative Unit Package (para.5)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly	“The attribute uID is used in relationships between instances of the S121_BasicAdministrativeUnit and Rights, Restrictions and/or Responsibilities (from LA_RRR) and parties (from LA_Party) information objects. It takes on the value Oid which consists of a namespace and an identifier. For example, Zone-23 has the id value 23 in the S-121 Zone namespace.”	

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1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
					resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”		
148.	KR	Annex F/ 3.2.1 Basic Administrative Unit Package (p.10)	3.2.1 Basic Administrative Unit Package (para.8)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“The attribute basicAdministrativeUnitContext allows the context for an instance of a BasicAdministrativeUnit to be described. This would include other information that would be included with a logical administrative unit in a legal document.”	
149.	KR	Annex F/ 3.2.2 Feature Unit (p.11)	3.2.2 Feature Unit (para.4,7,8)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that “[t]he activities of the [IHO]...do not include	“The attribute name provides a name of the feature unit. This may be the legal name by which a feature is known. The attribute legalStatusType describes the type of the feature; e.g. Marine Limit and Boundary (MLB) or A76 from UNCLOS or other. This attribute takes on values from the class legalStatusTypeList . The attribute context optionally describes the legal or administrative aspects of the feature object.”	

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					matters involving questions of international politics.”		
150.	KR	Annex F/ 3.2.3 Spatial Attribute (p.18)	3.2.3 Spatial Attribute (para.18)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“The Basic Administrative Unit (BasicAdministrativeUnit) relates to the S121_FeatureUnit to provide administrative attributes of Rights, Restrictions—or Responsibilities . These are attributes by reference of the FeatureUnit through the S121_BasicAdministrativeUnit and S121_RightsRestrictionsResponsibility information objects. This is shown in Figure 11.”	
151.	KR	Annex F/ 3.2.3 Spatial Attribute (p.18)	3.2.3 Spatial Attribute (para.19)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include	“As illustrated in Figure 7 a source may optionally be defined for a feature and a spatial attribute. Source may also be defined for a Basic Administrative Unit, Rights, Restrictions and—Responsibilities —and Parties in the Administrative attribute structure. Figure 12 shows details of the S121_Source and its derivation from the ISO 19152 classes. There are two subtypes of source defined in ISO 19152. In S-121 these are combined into a single type with an attribute to distinguish their type. At least one of the three attributes adminSourceType, spatialSourceType, or sourceType is required. These code lists are	

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					matters involving questions of international politics.”	Maritime Limits and Boundaries specific.”	
152.	KR	Annex F/ 3.2.3 Spatial Attribute (p.19)	3.2.3 Spatial Attribute (para.20)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“Figure 13 shows the S121_Source object with the associated code lists and associated support classes. A set of attributes, stereotyped S121, explicitly describe the information pertinent to source documents in a legal environment. ”	
153.	KR	Annex F/ 3.2.4 Party Unit Package (p.23)	3.2.4 Party Unit Package (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“A party is “a person or organization that plays a role in rights (5 ISO 19152 LADM clause 4.1.13)”. A Party is considered as an object. By treating parties (and rights, restrictions and responsibilities) as objects it means that they can be shared between features and also they can have attributes such as source and versioning applied to them. ISO 19152 has a Party model that allows for the establishment of groups as well as individual parties as individual objects. This is shown in Figure 14 which is based on the model in ISO 19152.”	

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154.	KR	Annex F/ 3.2.4 Party Unit Package (p.24)	3.2.4 Party Unit Package (para.3)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"The relationship between Parties, Group Parties, Rights, Restrictions and Responsibilities and feature objects (S121_BasicAdministrativeUnit) is by reference through the Oid (Object ID). pID is the identifier of the party and optionally exPID is an identifier of the party in an external registration."	
155.	KR	Annex F/ 3.2.5 RRR Administrative Package (p.24)	3.2.5 RRR Administrative Package (para.2)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"An aggregate class LA_RRR is defined in ISO 19152 that has three specializations: 1. LA_Right, with rights as instances. Rights are primarily in the legal domain. A cadastre may define ownership rights. ISO 19152 provides code lists to support ownership within a national legal structure. 2. LA_Responsibility, with responsibilities as instances. 3. LA_Restriction, with restrictions as instances. Restrictions usually apply to objects independent of the rights; that is, the related party can change and the restriction remains. "	

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156.	KR	Annex F/ 3.2.5 RRR Administrative Package (p.24)	3.2.5 RRR Administrative Package (para.3, 4)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Rights, responsibilities and restrictions appear as attributes for an S121_BasicAdministrativeUnit. These are subtypes of the collection class RightRestrictionResponsibility . In the S121 model these classes are realizations of the ISO 19152 RRR classes. In the ISO 19152 Land Administration Domain Model there are code lists which assign type to the rights, responsibilities and restrictions classes. These are land oriented types. For the marine environment these code lists have been replaced with code lists specialized to the marine environment. The code lists are: rightTypeList, restrictionTypeList, responsibilityTypeList. "	
157.	KR	Annex F/ 3.2.5 RRR Administrative Package (p.24~25)	3.2.5 RRR Administrative Package (para.7, 8)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"These objects are realizations of the S100_GF_InformationType. That is, they are object that may be referenced by other objects, but they do not carry spatial attributes. This is a preferable structure to introducing rights, responsibilities and restrictions as attributes of feature objects. Feature objects may point to the appropriate information objects using the Oid (Object ID) attribute. For example if a particular restriction applies to a fishing zone, then all features that invoke the restriction would point to the information object that establishes that restriction. If the restriction is changed it only needs to be changed once, not through the attributes in possibly hundreds of feature objects.	

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						Figure 15 shows the S121 Administrative Rights, Responsibilities and Restrictions. "	
158.	KR	Annex F/ 3.2.6 RRR Structure (p.25, 26)	3.2.6 RRR Structure (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Figure 16 shows the combined structure of the attribute classes realized from the ISO 19152 LADM model. The Rights, Responsibilities and Restrictions provide guidance on how to define attributes that are included in the Feature Catalogue attributes. Each Right, Responsibility, and Restriction will be included in the Feature Catalogue as a separate simple or complex attribute."	
159.	KR	Annex F/ 3.2.7 Governance Object (p.26)	Annex F/ 3.2.7 Governance Object (para.1)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Treaties and other descriptive legal documents normally contain a textual preamble that contains information specific to the legal-status of the data, or exchange data set (such as a submission to DOALOS). This information requires another type of Information Object. This information object is called a governance object. This information is not metadata. It is part of the dataset containing specific legal-text , but it may duplicate some metadata elements such as title. The governance data object may be versioned and can reference a source or sources."	

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160.	KR	Annex F/ 3.2.7 Governance Object (p.27)	Annex F/ 3.2.7 Governance Object (para.4)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	<p>referenceNumber - The reference number of the legal reference.</p> <p>label – A short textual identifier of the governance object.</p> <p>name – The name of the governance object.</p> <p>governanceTitle – The title of the legal reference.</p> <p>governanceDescription – A character string containing the governance statement.</p> <p>releasabilityType – Optionally used to differentiate between releasability status for particular features</p> <p>dateApproved - The date at which the legal statement or document was approved by the appropriate governing body.</p> <p>dateConsidered – The date at which the legal statement or document was considered by the appropriate governing body.</p> <p>dateIntroduced - The date at which the legal statement or document was introduced."</p>	
161.	KR	Annex F/ 4 Using the S121 RRR Structure (p.30)	4 Using the S121 RRR Structure (para.1)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General	"ISO 19152 is a conceptual model standard. It provides elements that can be used in other standards such as the IHO S-100 standard series to structure data so that communities of interest can communicate using a shared vocabulary. ISO 19152 reflects the social relationship regarding rights, restrictions and responsibilities to a geographic area. This allows legal rights to be expressed."	

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					Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."		
162.	KR	Annex F/ 4 Using the S121 RRR Structure (p.30)	4 Using the S121 RRR Structure (para.3)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"These elements are implemented as information objects for two reasons. First of all, the fact that Rights, Responsibilities and Restrictions are information objects allows for the multiplicity available in the ISO 19152 conceptual model. A Feature Type, represented as an S121_FeatureUnit can reference any number of Rights, Responsibilities and Restrictions or Parties through the S121_BasicAdministrativeUnit. Also Rights, Responsibilities and Restrictions and Parties can be shared. The same right can apply to many objects. If a restriction changes, a new version of the S121_Restriction object can be generated and all of the objects that pointed to the old version of the restriction can be updated together. "	
163.	KR	Annex F/ 4 Using the S121 RRR Structure (p.30)	4 Using the S121 RRR Structure (para.4)	ge	This specification (S-121) is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include	"Figure 19 presents a complete implementation model for the S121 structure. This is a simplification of the model shown in Figure 16 with relations navigable in one direction. This means that an implementation can use pointers in an exchange standard such as XML that allows repetition or simple single ended join tables in a database implementation. The direction of the pointers emanate from the Feature Type object ImplementationClass::S121_FeatureUnit to	

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					matters involving questions of international politics.”	the feature spatial attributes and legal attribute structure . That is, the Feature Type object is the central object (as it is in S-100), and the legal administrative structure serves as an attribute structure.”	
164.	KR	Annex F/ 4 Using the S121 RRR Structure (p.32)	4 Using the S121 RRR Structure (para.10, 11)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics.”	“Administrative Group – The administrative group carry the legal attributes and the relations to parties. The class “ImplementationClass:: BasicAdministrativeUnit” is a table that is pointed to by the S-100 compatible Feature. That is, the pointer can be considered as a simple referenced attribute of the S-100 compatible feature object. This is the only link from the S-100 environment to the Legal Administrative environment (except for the simple attributes for version and source). The class “ImplementationClass:: BasicAdministrativeUnit” also points to the Right Restriction and Responsibility objects “ImplementationClass:: Right ”, “ImplementationClass:: Responsibility ” and “ImplementationClass:: Restriction ”, “ImplementationClass:: Source”, and “ImplementationClass:: Party”. The pointer to “ImplementationClass:: Party” is there for completeness to match the ISO model, but is seldom needed. The classes “ImplementationClass:: Right ”, “ImplementationClass:: Responsibility ” and “ImplementationClass:: Restriction ” can also be implemented as simple tables with	

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						attributes. Each is the same and have two pointers, one to "ImplementationClass:: Source" and another to "ImplementationClass:: Party".	
165.	KR	Annex F/ 4 Using the S121 RRR Structure (p.32)	4 Using the S121 RRR Structure (para.13)	ge	This specification (S-121) includes not only UNCLOS-defined marine areas but also associated rights, restrictions, and responsibilities and is intended to have a legal effect. This is clearly beyond the scope of developing "technical standards" regarding deposited information as mandated by the 2004 United Nations General Assembly resolution (A/RES/59/24), contradicts the consultative and technical nature of the IHO (Article 2 of the Convention on the IHO), and is in violation of Article 1 of the General Regulations of the IHO—which states that "[t]he activities of the [IHO]...do not include matters involving questions of international politics."	"Figure 20 illustrates a simple implementation that only uses Party and Right and Restriction (although Responsibility could be easily added). There is no relation established between the BasicAdministrativeUnit and Party. The abstract class is not shown, and the relations are direct between BasicAdministrativeUnit and Right—and Restriction . This is common case."	

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