

1	2	(3)	4	5	(6)	(7)	
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Product Spec	US	5.1	Paragraph 3	ed	The following text is inaccurate and the word "transformed" is not used correctly: "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."	Propose change to "because a conversion to decimal degrees would constitute a change in format from its legally defined value. The same latitude and longitude position may also be stored as a set of real numbers within a GIS so that it can be used digitally"	
Product Spec	US	5.1	Paragraph 4	ed	The following is not accurate: Because the coastline and baseline are linked to the land, the reference systems used to define national sets of MLBs tend to be the land based reference systems that are associated with various continents and other land masses. International data may be referenced to a world reference system such as WGS84, but in such cases the transformations parameters to local land based reference systems may also be required.		
Product Spec	US	6.3.4	Paragraph 2	ed	The following text is misplaced (i.e., this text does not describe a topological inconsistency): 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.	Can the text be deleted? I question whether or not it's the role of this standard to ensure that legal documents match the MLB coordinates. I think S-121 is simply setting out a formatted way for coastal States to formally share their MLB data. Actually your text in 6.4.1 makes this very clear that MLB-formatted data has absolute accuracy.	
Product Spec	US	6.4.1	Paragraph 3		This section regarding cartographic data is inaccurate; charts are the first mechanism called out in UNCLOS for depositing MLBs with the UN.		
Product Spec	US		Introduction	ed	grammar	Change "...the deposited of a national maritime boundary claims..." to "...the deposit of a national maritime boundary claims..."	
Product	US	1	Overview	ed	Consistency of reference to the product specification	Change "S121" to "S-121"	

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Spec					identifier		
Product Spec	US	1	Overview	ed	spelling	Change “Land Administrative Domain Model” to “Land Administration Domain Model”	
Product Spec	US	1.4.3		ed	Incorrect reference	Change “Division of Ocean Affairs Law of the Sea” to “Division for Ocean Affairs and the Law of the Sea”	
Product Spec	US	3	Geographic Description	ed	Incorrect reference	Change “ISO 3166-1:1997” to “ISO 3166-1: 2013 ”	
Product Spec	US	Various		ed	Consistency of usage of “Maritime Limits and Boundaries”. Sometimes it is spelled out, sometimes “MLB”; in 1.1 it is “maritime limits and boundaries” in 3 ‘Spatial resolution’ it is “Maritime limits and boundaries”		
Product Spec	US	5.1	Horizontal reference system, para 4	ed	Spelling	“land based reference systems” to “ land-based reference systems”	
Product Spec	US	10 item 1		ed	Typo	... GIS system or it may be formatted in GML as a layer that may...	
Product Spec	US	App. D item 2		ed	Incorrect reference	Change “ISO 3166-1:1997” to “ISO 3166-1: 2013 ”	
Product Spec	US	App. D item 2		ed	Incorrect reference	Add “Part 1 – country codes”	

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Product Spec	US	10		ge/te	Per Annex B description of encoding possible revisions, would recommend that this section be paired down to single data format – UN/DOALOS “List of Geographic Coordinates.”		
Product Spec	US	Appendix A	Table in A4	ge/te	Per Annex B description of encoding possible revisions, would recommend that this section be paired down to single data format – UN/DOALOS “List of Geographic Coordinates.”		
Product Spec	US	Appendix B	ALL	ge/te	These use cases should be included for informative purposes only, but not through the entirety of the document.	These use cases are not relevant to the specification, but may have been relevant in how the specification was formed over time. If the main purpose for this product specification is to deposit MLB to DOALOS, and that deposit will occur through human readable text format, then other formats are necessary to expand upon through this set of documents. Furthermore, this specification should defer to S101 product specification for harmonization of features within the ENC, which may be used to fulfil the deposit requirement through a chart.	
Annex A	US	2	Page 3	te, ed	The definition of Baseline Point is unnecessarily complex. There is no need to separately refer to archipelagic baselines, as they share the same character (see Article 48). Also, the current definition is not correct with respect to the continental shelf “up to 200 nautical miles”). Per Article 76, paragraphs 5 and 6, the outer limit may in some circumstances be measured 350 M from the baseline.	“Baseline Point: A point on a baseline from which the breadth of the territorial sea and other maritime zones is measured.”	
Annex A	US	2	Page 3	te, ed	Regarding the definition of Contributing Point , for clarity, use the definition just created above, rather than refer to a point on the baseline.	“Contributing Point: A point, typically a “baseline point”... “	
Annex	US	2	Page 3 and	ed	Regarding the definition of International Boundary ,	“International Boundary: A delimitation	

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x A			page 6		there is no need to repeat “international,” as the definition makes this clear (“between...States”). Also, this definition appears twice (see p. 6)	between...” (delete “international”)	
Anne x A	US	2	Page 3 and 4	te, ed	Regarding the definition of “ Baseline (Articles 5, 6, 7, 9, 10, 11, 13, 14 and 47 of UNCLOS) ”, see explanation above for “Baseline Point” (need to fix the “up to 200 nautical miles” problem).	“ Baseline (Articles 5, 6, 7, 9, 10, 11, 13, 14 and 47 of UNCLOS) – A baseline is a line from which the breadth of the territorial sea and other maritime zones is measured.”	
Anne x A	US	2	Page 3 and 4	te, ed	Normal baseline is defined by Article 5 only Straight baseline is defined by Article 7 only. The definition in IHO Dictionary, S-32, 5th Edition is also incorrect.	Remove references to other articles in the definitions of these limit feature types. Convention provisions should be either referred to or repeated verbatim. Rewording the text leads to confusion and errors. If the text for “straight baselines” remains, remove vi and vii from Straight Baselines, as they are not “straight baselines” (see e.g., Article 10(6) distinguishing bay closing lines from “straight baselines”). The current text for “normal baseline” is also incorrect; it is not “formed by joining baseline points” (which is tautological when combined with the definition for baseline points). The definition is in Article 5 and should not be rephrased.	
Anne x A	US	2	Page 5 and 6	te, ed	Generally, these “Baseline” categorizations should strictly follow what is stated in the Convention. Recognizing that this may be impractical, simply refer to those articles. For instance, in the definition of “Bay Baseline”, there is no need to define a “bay”. Using “in accordance with Article 10” relieves us of having to include every detail.	“ Bay Baseline (Article 10 of UNCLOS) – A line drawn between the natural entrance points of a bay, in accordance with Article 10.”	
Anne x A	US	2	Page 6	te, ed	Regarding the definition of “ Outer Limit of the Contiguous Zone (Article 33 of UNCLOS) ”-- there is nothing in UNCLOS that says you cannot have	Remove the following phrase, “unless a boundary line with an adjacent or opposite coastal State does not allow to extend it up to that distance.”	

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					overlapping contiguous zones.		
Annex A	US	2	Page 6	te, ed	Regarding the definition of “ Outer Limit of the Continental Shelf (Article 76 of UNCLOS) ” the suggested revisions (1) removes the description of the inner limit (territorial sea), which is not relevant here, and (2) adds “in accordance with Article 76”, which relieves us of having to include every detail. The definition is challenging because paragraphs 2 to 7 actually modify paragraph 1, in that the outer limit may not always extend to the outer edge of the continental margin (see paras. 5 and 6).	“ Outer Limit of the Continental Shelf (Article 76 of UNCLOS) – The outer limit of the continental shelf is a line delineating the seabed and subsoil of the submarine areas that extend to the outer edge of the continental margin, or to a distance of 200 nautical miles from the baselines from which the breadth of the territorial sea is measured where the outer edge of the continental margin does not extend up to that distance. Where the outer edge of the continental margin extends beyond 200 M from the baselines, the outer limit of the continental shelf is delineated in accordance with paragraphs 2 to 7 of Article 76.”	
Annex A	US	2	Page 6 and 7	te, ed	Regarding the definition of “ Archipelagic Waters ”, the proposed change would refer to the correct article of the Convention and better conform to the Convention’s wording (Article 49).	“ Archipelagic Waters ” definition should refer to Article 49, not 47. Minor addition (underlined): “Archipelagic waters are waters enclosed by the archipelagic baselines <u>drawn in accordance with Article 47...</u> ”	
Annex A	US	2	Page 7	te, ed	Definition of “ Exclusive Economic Zone (Part V of UNCLOS) ” There is no need to get into the legal rights of States within the zones being referred to (and this is not done for other zones)	Delete final sentence (starting “Coastal states have sovereign rights...”).	
Annex A	US	2	Page 7	te, ed	Definition of “ Continental Shelf (Part V of UNCLOS) ”. Final sentence is confusing and unnecessary. As the definition states the continental shelf IS the seabed and subsoil. It’s a physical thing, unlike the EEZ.	Delete final sentence (“The regime of the continental shelf applies only to its seabed and subsoil.”).	
Annex A	US	2	Page 7	te, ed	Regarding the definition of “ High Seas (Part VII of UNCLOS) ”, the revision would avoid the phrase “all parts of the sea that are a zone”, which is confusing and departs from Article 86. It’s already clear we are talking about a “zone” in this section of the document.	“ High Seas (Part VII of UNCLOS) - The high seas are all parts of the sea that are not included in the exclusive economic zone, in the territorial sea or in the internal waters of a State, or in the archipelagic waters of an archipelagic State.”	

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					Also, suggest deleting the last sentence, as there is no need to get into the legal rights of States.		
Annex A	US	2	Page 7	te, ed	Definition of Area (Part XI of UNCLOS) - Final sentence is confusing and unnecessary. As the definition states, the Area IS the seabed and subsoil...	Delete final sentence ("The regime of the area applies only to its seabed and subsoil.")	
Annex A	US	4.1	Page 15 et seq.	te, ed	Conforming changes should be made to the "definitions" of various Location Feature Objects, per above.		
Annex A	US	2	Page 6 4.2.17	te, ed	There is no such thing as the outer limit of a roadstead in UNCLOS. Roadsteads described in Article 12 are "included in the territorial sea." So this outer limit is part of the outer limit of the territorial sea.	Remove the outer limit of roadstead from limits section and from Section 4.2.17.	
Annex A	US	2	Page 7 4.3.7	te, ed	A roadstead is not a zone. Per Article 12, a roadstead is included in the territorial sea.	Remove Roadstead from zone section and from Section 4.3.7.	
Annex A	US	2	Page 7	te, ed	The note at the bottom of the page tries to make a distinction between MLB objects that seemingly overlap with HYDRO objects. The chart is a legal instrument for deposit with UNCLOS, so I don't think asserting this distinction is helpful to those that want to use these features across the spectrum of S-100 uses.	Remove "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. 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."	
Annex A	US	2	Page 8 para 1	te	This paragraph needs further clarification	Re: Should there be mention of harmonization between S101 and S121? Change of stereotype from HYDRO to MLB or not?	
Annex A	US	2	Page 8	te, ed	Straight refers to a line or an edge, not a body of water. Also straits used for international navigation is defined in UNCLOS, so I'm not quite sure how/why it's listed with the state specific stuff.	Straight should be "strait" and maybe Straits Used for International Navigation, though there's nothing in UNCLOS stating that you need to specify the extent of an international strait. Related, I thought we agreed to remove these from the MLB product spec?	

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Annex A	US	2 4.5.2	Page 8		Outer limit of Coastal Waters definition is not generic enough to accommodate all States. Also, inland waters definitions do not match anything the US might use.	I thought we agreed to remove these from the MLB product spec? These are more in the realm of marine limits and boundaries rather than UNCLOS maritime limits and boundaries. If you won't remove "coastal waters," then another suggestion is to remove specific reference to "not exceeding 3 nautical miles" The U.S. could have "coastal waters" that go out to 9nm. Inland waters refer to COLREGS demarcation lines and have no relationship to UNCLOS internal waters.	
Annex A	US			ed	Inconsistency of fonts used in Annex A; for an example, compare "Inland Waters" and "Overlap Zone" text in Annex A 2	Standardize font used for text; preferably to match the main S-121 text document	
Annex A	US	2	Limit feature types	ed	Duplicate entries for "International Boundary"	Remove one entry	
Annex A	US	2	Limit feature types	ed	Wording; "Mouths of rivers" is the wording in UNCLOS Article 9. Also see comments on Annex A 4.2 below	Change "Mouth of Rivers" to "Mouths of Rivers" or possibly "Mouth of River"	
Annex A	US	2	Zone feature types – The Area	ed	Spelling; UNCLOS Part XI uses "sea-bed" but general usage appears to be "seabed"; also 4.10.12.5 where "seabed" is used	Change "sea bed" to "seabed"	
Annex A	US	2	Zone feature types – The Area	ed	Spelling correction	Change "Straight" to "Strait"	
Annex A	US	3.2	Para 2	ed	Object names should not have a space between the words	Change "...Normal Baseline, Straight Baseline, Archipelagic Baseline... Outer Limit of the Territorial Sea, Outer Limit of the Contiguous Zone, Outer Limit of the Exclusive Economic Zone, Outer Limit of the Continental Shelf, Outer Limit of the Roadstead, and Construction Line" to "... NormalBaseline, StraightBaseline, ArchipelagicBaseline...OuterLimitoftheTerritorial	

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						Sea, OuterLimitoftheContiguousZone, OuterLimitoftheExclusiveEconomicZone, OuterLimitoftheContinentalShelf, OuterLimitoftheRoadstead, and ConstructionLine	
Annex A	US	4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 4.2.6, 4.2.7, 4.2.8, 4.2.9	Distinguishing Features	ed	Spelling correction; also see comment above on Annex A 2 about how to resolve	Change "MouthorRiverBaseline" to "MouthofRiverBaseline"	
Annex A	US	4.2.6; 4.10.6.9	heading	ed	Spelling correction; also see comment above on Annex A 2 about how to resolve	Change "Mouth of Rivers Baseline" to "Mouth of River Baseline"	
Annex A	US	4.2.12-16	Distinguishing Features	ed	List is copied and pasted through these objects and should not include the object for which it is under	Remove appropriate object from list	
Annex A	US	4.2.16	heading	ed	Consistency of style of heading	Change "Outer Limit Of The Exclusive Economic Zone" to "Outer Limit of the Exclusive Economic Zone"	
Annex A	US	4.2.17, 4.3.7 4.10.6.16 4.10.7.5	ALL	te	Remove. Roadstead has neither an outer limit or is a Zone.		
Annex A	US	4.3.1	Heading, Name, and CamelCase	ed	Spelling correction	Change "Archipelagic Water" to "Archipelagic Waters"	
Annex A	US	4.3.5; 4.10.7.9	Heading, Name, and CamelCase	ed	Spelling correction; Part VII uses "High Seas"	Change "High Sea" to "High Seas"	
Annex A	US	4.3.6; 4.10.7.2	Heading, Name, and CamelCase	ed	Spelling correction	Change "Internal Water" to "Internal Waters"	
Annex	US	4.5.1	Heading,	ed	Spelling correction;	Change "Outer Limit of the Inland Water" to	

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A			Name, Alias, and CamelCase			“Outer Limit of the Inland Waters”	
Annex A	US	4.5.2	Heading, Name, Alias, and CamelCase	ed	Spelling correction;	Change “Outer Limit of the Coastal Water” to “Outer Limit of the Coastal Waters”	
Annex A	US	4.5.3	Heading, Name, and CamelCase	ed	Spelling correction;	Change “Inland Water” to “Inland Waters”	
Annex A	US	4.5.4	Heading, Name, and CamelCase	ed	Spelling correction;	Change “Coastal Water” to “Coastal Waters”	
Annex A	US	4.5.7	Heading, Name, Alias, and CamelCase	ed	Spelling correction	Change “Straight” to “Strait”	
Annex A	US	4.10.6.8	Heading and Name	ed	Spelling correction; but perhaps hyphens are not allowed (?)	Change “Low Tide Elevation Baseline” to “Low-Tide Elevation Baseline	
Annex B	US	Overview		ed	Since our recommendation is to remove use cases from through the core set of documents, only make mention of the list of geographic coordinates deposit format.	Remove “The S-121 Product Specification defines several use cases. This document refines those use cases and describes the interfaces required to support each use case. Each use case is different and there are also differences between several sub use cases. For many of the use cases existing standards defined in ISO and OGC are sufficient.” Rework: “However for the specific...” so that is states... The deposit of...	
Annex B	US	2	ALL	ge	The use cases are not relevant to describing the encoding format.	Rename 2 Use Cases to: 2 List of Geographic Coordinates for Deposit Remove remaining text before and after subpart	

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						2).	
Annex B	US	3	ALL	ge	The use cases are not relevant to describing the encoding format, thus relevant output formats should be removed.	Recommend Section 3 text read as follows: “This document provides more detail for the deposit of a “List of Geographic Coordinates” to UN/DOALOS. The format allows Locations, Limits (and Boundaries) and Zones with their associated S-100 [1] compliant geometric Points, Curves and Surfaces to be described.”	
Annex B	US	3.1.x	ALL	ed	The use cases are not relevant to describing the encoding format, thus relevant output formats should be removed.	Remove 3.1, 3.1.1, 3.1.2, 3.1.3	
Annex B	US	3.2	Header	ed	No longer a “Use Case”	Header to read: List of Geographic Coordinates	
Annex B	US	3.2		ed	Usage	Change “200 Miles” to “200 nautical miles”	
Annex B	US	3.2.2	ALL	ed	Remove section not relevant to UN/DOALOS deposit requirement.		
Annex B	US	3.3.x	ALL	ed	The use cases are not relevant to describing the encoding format, thus relevant output formats should be removed.	Remove 3.3,3.3.1 (3 subsequent tables)	
Annex B	US	App.F	Item 24	ed	Spelling; see https://www.esri.com/en-us/home	Change “ESRI” to “Esri”	
Annex F	US	Intro (1); 2;		ed	spelling	Change “Land Administrative Domain Model” to “Land Administration Domain Model”	
Annex F	US	2	Para 4	ed	spelling	Change “Marine Limits and Boundaries” to “Maritime Limits and Boundaries”	
Annex F	US	3.1	Para 2 – last line on p.5	ed	Consistency of reference to the product specification identifier	Change “S121” to “S-121”	

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Annex F	US	3.2	Top p. 8	ed	spelling	Change "Land Domain Administrative Model" to "Land Administration Domain Model"	
all	US			ed	Standardize spelling of "Cadastre/Cadaster"		
ALL	US			ge	With current emphasis on developing a text file to share with DOALOS (so they can turn it into a GIS file), there is little practical application of S-121 outside if it does not also seek to improve and expand the MLB objects that are currently used within S-101. There is still a need to harmonize S-101 and S-121 and request that S-121 submit the objects to S-101 for incorporation. For use in charts, S-101 call on S-121 members as the experts to expand S-101 PS to include relevant S-121 objects. Also request that S-101 work with ECDIS software developers, so that coastal States have available to them the full suite of MLB objects and geometries.		

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