To Pete Resnick, Barry Leiba, Tim Bray and others whom it may concern,

It has come to the attention of ECMA's Technical Committee 39 ("TC39") -- the standards-setting organization for JavaScript -- that a Last Call has been issued for RFC4627bis: http://datatracker.ietf.org/doc/draft-ietf-ison-rfc4627bis/

Ecma International has published a normative standard for the JSON syntactic grammar since December 2009 as part of ECMA-262 5th Edition. This standard is also published as ISO/IEC 16262:2011. JSON has many uses outside of ECMAScript and earlier this year the Ecma General Assembly approved publication of the JSON grammar as a standalone standard, ECMA-404. Future editions of ECMA-262 will normatively reference ECMA-404.

TC39 plans to start in December 2013 the fast-track process for issuing ECMA-404 as an ISO/IEC JTC1 standard.

We request that the IETF JSON Working Group:

- Restore the original title of RFC4627 to "The application/json Media Type for JavaScript Object Notation (JSON)" from "The JSON Data Interchange Format".
- That no IETF specification contain a redundant normative definition of the JSON grammar and that they instead normatively reference ECMA-404.
- Should an editorial need arise to reproduce the grammar in any notational form, any part
 of the grammar reproduced must be informative text, accompanied by a normative
 reference to ECMA-404.

We are concerned that differences in JSON grammar called out in Section 1.2 of RFC4627bis. This is a special case of a larger worry about potential future divergence between these two specifications.

TC39 understands that there are domain specific JSON interchange and interoperability issues that are beyond the scope of the JSON grammar and that this is appropriate subject matter for the IETF to address. For example, the RFC4627bis draft also includes language related to encoding issues when transferring JSON documents under the registered media type. We believe it is important that concerns such as encoding issues not be conflated in the same document with the definition of the JSON grammar.

A revision to RFC4627 that contains contains the media type registration along with a normative reference to ECMA-404 while maintaining the original title of RFC4627 seems a productive first step in reducing confusion.

Warmest Regards,

ECMA TC39

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