

## Template for comments and editor observations

Date:	Document: Draft Resolution
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1	2	(3)	4	5	(6)	(7)
mbr <sup>1</sup>	Line / Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of comment <sup>2</sup>	Comment (justification for change) by the member	Proposed change by the member	Editor observations on each comment submitted
SE	35 and 145		GE	The Swedish forum recommend that work is continued on established standards, <u>not</u> that new standardisation is created to avoid jet another standard.		
SE	75 and 97		GE	Focus should be on content, <u>not</u> on format.		
SE	73			It is important that an interoperability model is open to commercial actors and the business models used by commercial actors. The interoperability model should recognize that the distribution of e-invoices give rise to costs when it comes to; data distribution, the establishment of communication protocols, the validation of invoice content and customer support. A prerequisite for a successful model is the ability for the actors on the e-invoice market to cover their costs and to gain revenues. Finally the model must cover the aspects of non conduct of actors.		
SE	79 and 150		GE, TE	A common semantic description is desirable, a dictionary of terms, were the terms are defined and described. This should be independent of technology and format and a description of the business content of the invoice.		
SE	129		GE	It is important that the definition of a "core invoice" also comprise accounting and bookkeeping legislation. An e-invoice is also a verification for a business transaction and it is important that the content of, the distribution of and the storage of an e-invoice does comply with the accounting and		

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				bookkeeping legislation. The result of the MUG project should be reviewed and the work should be conducted in close cooperation with international standard bodies such as UN/CEFACT, ISO and GS 1. The distinction between “common” and “legal” is not clear.		
SE	129		GE	A major obstacle on the e-invoice market is local ERP system implementations which lead to buyer specific demands for invoice content directed to suppliers. The definition of a core invoice should be conducted in close cooperation with ERP vendors in order to guarantee that the definition of the core is respected in the process of implementing ERP systems.		
SE	60, 125, 223, 238		GE and ED	<p>Core is possible to carry through, but the Swedish forum <u>does not agree</u> if the platform that should be used should have a European (CEN) or Global (UN/CEFACT) focus.</p> <p><b>Voices for CEN:</b> The establishment of a semantic data model for a core invoice within Europe can be based on international standards. We welcome the initiative to further formalize and coordinate different initiatives to promote core invoices in Europe by means of standardization in CEN.</p> <p>The work in CEN can, based on available international standards, handle the necessary contextualization of the use of the core invoice. This step will also bring forward interoperability on a global level. The work in CEN can also be a catalyst for further work in global organizations. / Ekonomistyrningsverket /SFTI /Sveriges Kommuner och Landsting</p>	<p>The Swedish forum <u>can not</u> support that the semantic data model for the core section of an electronic invoice should be formalized in a European norm.</p> <p>Exclude references to existing international organizations and interoperability models from the recommendation. References should be <u>comprehensive</u> and made in a separate appendix.</p>	

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				<p><b>Voices for UN/CEFACT:</b>                      An ever-increasing amount of trade takes place with companies in countries outside Europe. It is therefore important that solutions are not developed on a European basis, since this will make it difficult for SMEs to do business with companies outside Europe. For large companies which trade globally, too, different solutions in different parts of the world incur additional costs. To avoid development of yet another proprietary standard for electronic invoices, work on the design of a core invoice should be done at the global level and be based on an existing global standard. The work should therefore be carried out under the auspices of UN/CEFACT which is a standardisation body with a transparent and operational process bringing together nations and stakeholders for the development and maintenance of e-business from a global perspective.                      /Construction industry's e-business standard, BEAst                      /GS1 Sweden                      /National Board of Trade                      /Odette Sweden                      /Swedish Bankers' Association</p> <p>There are also several neutral voices in the Swedish forum.</p>		
SE	139		GE	<p>Extensions can be good if it is done with a common methodology.</p> <p>The concept of Extensions needs to be developed regarding methodology, rules and expected outcome before it is possible to consider the concept. Before the concept is recommended there needs to be assured that there are solutions and</p>	Add text to describe how extensions can be handled.	

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SE	139		GE	<p>Extensions can be good if it is done with a common methodology.</p> <p>The concept of Extensions needs to be developed regarding methodology, rules and expected outcome before it is possible to consider the concept. Before the concept is recommended there needs to be assured that there are solutions and competence. The construction of the model and guidelines needs to be handled in a broad forum and based on a general accepted method. To ensure global access to solutions and competence, the model and framework for extensions must be designed at the global level based on a widely accepted technique before the concept can be used.</p>	Add text to describe how extensions can be handled.	
SE			GE	<p>This version has improved since previous version. Still we see a need for refining the text in the recommendation to avoid minor ambiguities and we also think the background documents needs some work to avoid misunderstandings.</p>	Continue improvements.	

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