

Comment/Question Submitter	Submission Date	Comment/Question	Notes	Status	Revisions
Tim Allison, NASA JPL	6/6/2022	I was impressed with "DRAFT Technical Guidelines for Digitizing Cultural Heritage Materials - 3rd Edition", especially the care and thought that went into the metadata section. The emphasis on evaluation and sampling was also impressive. My only minor critique is on this sentence in section 6.7: "Optical Character Recognition (OCR) is the process of converting a raster image of text into searchable American Standard Code for Information Exchange (ASCII) data." I realize most docs the federal gov't deals with are in English or other ASCIIable language, but it might be better to use "searchable electronic text" or something that doesn't narrow the encoding to something as limited as ASCII. Hopefully, the output of OCR would be in UTF-8 or UTF-16, for example.	Also, page 117: ascii-> Unicode text or similar	Accepted	Revisions made to Section 6.7 (p. 89) and glossary definition for OCR (Appendix A, p. 123) on 10/25/2022
Rob Buckley	6/13/2022	Is there a version or edit history that documents the differences between the 2nd and 3rd editions of the FADGI Guidelines? Your posting on The Signal gives an overview of the additions and changes. A detailed edit history would be useful since it would allow a reviewer to focus on the sections that have changed and ignore those that are the same as the 2nd edition, which presumably are no longer up for comment. Or are comments being invited on the entire document and just not the amendments to the 2nd edition?	In Section 1.2 of the document (p. 9) there is a more complete list of what was updated between the 2nd and 3rd editions, however, it is not a granular list. For additional transparency on revisions made from the draft version published for public comment in June 2022 and the final version of the 3rd edition published in May 2023, this comment and response log will be published to the FADGI website. There will also be a granular change log and a version of the final edition with changes from the June 2022 draft version highlighted.	Response sent to commenter in June 2022	N/A
Spencer Zidarich, Hoover Institution Library and Archives	7/5/2022	In section 2.4.3, I was delighted to see the acknowledgement that gray target patches are not—and are not guaranteed to be—truly colorless. However, because of this, when setting white balance in software, not all gray patches will return the same white balance values. Perhaps it's worth mentioning that the a* and b* values printed on a DICE target can be used as a guide to identify the most spectrally neutral gray patch for the user to define the imaging system's white balance during calibration. Then, once optimized, white balance settings can (should?) be saved for future use. Accurate and precise white balance over time also relies on the cleanliness and/or age of the target patch.	FADGI does not specify how to calibrate cameras at individual level. There are many ways to meet requirements, the guidelines do not prescribe a certain methodology to meet requirements. There is a bullet in Section 7.4.2 (p. 92) noting that targets accumulate dirt and other wear and tear over time that reduce their usability.	Out of Scope	N/A
Spencer Zidarich, Hoover Institution Library and Archives	7/5/2022	In section 3.6, it would be interesting to include a rule of thumb that the Library of Congress follows to define an "oversize" item's dimensions. Larger than what will fit in a traditional manuscript box? Larger than 30 x 40 inches? This might help give some direction to institutions balancing digitizing historically significant posters that warrant 4-star performance and are technically prints, but may be impractical to digitize at the (Prints and Photographs) 4-star sampling frequency (i.e. 600ppi) due to maximum imaging system resolution, limited field of view, stitching methodologies/capabilities, etc.	The meaning of the term "oversized" can vary depending on different factors, so the Guidelines do not include specific measurements that categorize an object as "oversized."	Out of Scope	N/A
JP Westenskow, Center for Creative Photography	7/7/2022	I noticed today that the Dynamic Range metric is grayed out in the new version and also noticed that Dynamic Range is also not defined. I'm assuming it is an optical density value based on the numbers given but I think it would be helpful to define it. Most of the other metrics are defined earlier in the document and perhaps a brief description could be included there.	At this time, Dynamic Range is an informative evaluation parameter, meaning it's not required for FADGI conformance. This and other informative parameters are "grayed out" in the parameter tables in Chapter 3 (beginning p. 27) to differentiate them from required metrics. The final version of the 3rd edition includes a note under each parameter table in Chapter 3 clarifying that the "grayed out" metrics are informative.	Accepted	A definition for Dynamic Range was added to Section 2.4.15 (p. 19) along with other evaluation parameters, and to the document glossary (Appendix A, p. 117). The final version of the 3rd edition includes a note under each parameter table in Chapter 3 clarifying that the "grayed out" metrics are informative.
JP Westenskow, Center for Creative Photography	7/7/2022	I'm also a bit confused by the Highlight/Shadow description: "2.4.14 Highlight/Shadow, Tolerance These values remain under review. References to legacy digital counts are being converted to L* values." Is this to mean in the final document that the given RGB values in the draft are going to be converted to L* values? (to clarify, the metric in transmissive materials is given in RGB)	The Working Group was still in the process of converting the values to L* at the time the draft version of the 3rd Edition was published in June 2022. Those values are updated in the final version.	Accepted	Revisions made to Section 2.4.15 (p. 19). Values for Highlight/Shadow, Tolerance have been updated for all applicable tables in Chapter 3: Evaluation Criteria Values (beginning p. 27), and are displayed as grayed out to indicate that this is an informative metric. All digital count values have been removed.
Phillippe Bayle, DigiBook	7/12/2022	Question: I don't really understand what the tolerances written in light gray are: (9, 6 and 3 values for example for [Tone Response (OECP)] "Bound Volumes: Rare and Special Materials"). It seems to be the [same] ones used in the 2010 version. In the 2016 version, I understood that the light gray tolerances were those from 2010: 9, 6 and 3. 2016 tolerances are different (8, 5 and 2 count levels for example for [Tone Response (OECP)] (Luminance) "Bound Volumes: Rare and Special Materials"). NOTE: This comment included screenshots from the document that are not included in this spreadsheet. They can be viewed on the Comments page on the FADGI website here: https://www.digitizationguidelines.gov/guidelines/digitize-technical-comments.html	In the tables in Chapter 3 (p. 27), certain rows are shaded white and have lighter text than others (they're "grayed out"). These rows are informative measures that are included for reference, but are not required evaluation criteria. In the draft version of the 3rd edition, some of these informative metrics include digital count values carried over from the 2010 (1st edition) and 2016 (2nd edition) of the guidelines. These have been removed.	Accepted	Under each table in Chapter 3: Evaluation Criteria Values for Specific Material Types, the following note has been added: "Note: The white rows with light gray text in the table above are informative only, and are not required parameters for each FADGI star level. The Digital Count metrics have been removed from this version of the Guidelines." This is also noted in Section 2.4 (p. 12) and for evaluation parameters that are considered informative only in Sections 2.4.3 (p. 13), 2.4.15 (p. 19), and 2.4.16 (p. 19). All digital count values from the 1st and 2nd editions of the guidelines have been removed.
Phillippe Bayle, DigiBook	7/12/2022	Comments: Why not use delta E 2000 formula with SL=1 like in ISO19264-1? See Roy Berns for more details about SL=1.		Accepted	This formula is already being used.
Phillippe Bayle, DigiBook	7/12/2022	Tone scale tolerances from "Bound Volumes: Rare and Special Materials": +/- 2L* for 4 star is OK (same as ISO19264-1 level A) but +/- 5L* for 3 star looks wide (L* go from 0 to 100 and RGB from 0 to 255 so +/- 5L* means +/- 12 RGB levels as it was +/- 4 in 2016 version). And 2 star gives +/- 8L* which is more than 20 RGB levels! Is there a mistake in units? (RGB instead of L*). Looks like unit changed from RGB to L* but values stayed the same. 1% lightness uniformity is difficult to achieve and maintain, especially on large formats like A0. Did you consider enlarging tolerances for large formats? NOTE: This comment included screenshots from the document that are not included in this spreadsheet. They can be viewed on the Comments page on the FADGI website here: https://www.digitizationguidelines.gov/guidelines/digitize-technical-comments.html		Accepted	In the tables in Chapter 3: Evaluation Criteria Values (p. 27), the Guidelines now propose new tolerance thresholds which will provide near equivalence between colorimetric and digital count values for sRGB and AdobeRGB colorspaces. These new values are consistent with the Metamorphose levels. Note: Only the 3-star values are used in the Modern Textual Records. Some categories, such as Rare Materials do not have any values for the 1-star.
Digital Transitions (Doug Peterson)	7/15/2022	2.4.4 Lightness Uniformity. We suggest this section be extended to discuss the inherent complexity objects with a glossy or semi-gloss surface and for material that has dimensionality. Targets tend to have glossy or semi-gloss patches which will provide a measurement of illumination uniformity that is not relevant to a matte-paper subject in the same lighting. This can lead to situations where the target indicates unacceptable illumination uniformity while real-world subjects produce excellent results. Even worse, it can lead to situations where the target indicates acceptable illumination uniformity while real-world subjects do not. A robust way to check for genuine illumination uniformity is to capture the subject at 0° and 90° rotations and then digitally rotate them to match; it's the same subject in each case so all parts of the subject should be the same brightness in both captures.		Accepted	Revision added to Section 2.4.5 (p. 13): "Flat fielding software using captured data from extended and uniform matte surface targets provides a simple and effective method of reducing non-uniformity, but should not be a substitute for good professional imaging technique. Aggressive corrections can in themselves introduce digital noise artifacts into the finished image file. Target surfaces with glossy or semi-gloss surfaces should be avoided. Note: The values for transmissive collection types are considered provisional. This is indicated in the evaluation parameters tables in Sections 3.9, 3.10, 3.11, 3.12, and 3.14."
Digital Transitions (Doug Peterson)	7/15/2022	2.4.5 Color Accuracy. "Targets with a small number of color and density patches can provide a good analysis of system consistency, but cannot provide information suitable for creating ICC color profiles. Targets with 100 or more measurement patches will provide a better input to ICC profile creation software" This is clearly labeled as a "general rule" but I think it's worth fleshing out some of what the "general rule" will miss. We would suggest... However, quantity of patches is not the only driver of how well suited a given physical target is serve as an input for calibration. Other factors include how well matched the patches are to the range of material in the collection being imaged, the flatness/parallelism of the patches (some targets tend to bow over time). It's also important to keep targets clean over time, and not all targets can be cleaned. The Library of Congress has sponsored considerable research in this area, including the creation of a Next Generation Target for color profile creation and validation. (*) Also I think there is a minor typo in this section. "rotating" should be "rotating". *A reference to "Next Generation Target (NGT) Evaluation Task A: Evaluate the effectiveness of the three color targets" can be included in the references.	The majority of the comment/recommendation is out of scope. The guidelines do not prescribe any single methodology to meet requirements.	Partially Accepted	Typo ("rotating" to "rotating") corrected in Section 2.4.6 (p. 14) on 10/26. The report "Next Generation Target (NGT) Evaluation Task A: Evaluate the effectiveness of the three color targets" by David Wylie to be added to the FADGI Guidelines Resources page here: https://www.digitizationguidelines.gov/guidelines/digitize-technical-resources.html
Digital Transitions (Doug Peterson)	7/15/2022	2.4.6 Color Channel Mis-Registration. "Poor registration of the three color channels is a consequence of poor lens design or aperture choice." We suggest this continue... or can indicate damage to the physical lens. In systems that do not capture R, G, and B in a single sensor capture color channel misregistration can also indicate issues of mechanical calibration such as a falling stepper motor on a scanner.		Partially Accepted	The language in Section 2.4.7 (p. 14) has been updated. References to "lens design or aperture choice" have been removed and a definition of "color encoding accuracy" has been added in Section 2.4.6 (p. 14).
Digital Transitions (Doug Peterson)	7/15/2022	2.4.7 SFR* (Spatial Frequency Response) "It is related to the sharpness, focus, and ability to resolve fine details." - we suggest vibration and alignment to the system attributes that SFR elucidates. A perfectly sharp imaging system, exposed to problematic vibration, produces poor SFR results. We also suggest this section be extended to include a statement such as: "As with all metrics in this guide, the specific points of the SFR curve used for pass/fail metrics in FADGI are a surrogate rather than the ends to themselves. The underlying goal should be a system which is evenly and correctly rendering detail and in which the naturalistic appearance of detail is not compromised by post processing such as sharpening in such a way that the nature of the material is misrepresented. Especially at high resolutions, and in non-continuous subjects such as photographic film, the calculation of SFR from a target leads to a "noisy" curve which may undulate; it is the overall shape of the curve that is of underlying interest as an evaluative tool rather than the point measurement at exactly 50% and 10% of the modulation which forms the metric. See figure 3 for an example of the ideal overall curve that should be the goal of an imaging system."	The first part comment suggests specific issues when any number of situations or conditions may result in poor SFR results. Additionally, these conditions may only apply to specific imaging systems. FADGI aims to keep the Guidelines general rather than identify specific conditions while excluding others that are equally possible/important	Not Accepted	N/A

Digital Transitions (Doug Peterson)	7/15/2022	2.6.1 Room. "The working environment should be painted/decorated a neutral, matte gray with a 60% reflectance or less to minimize flare and perceptual biases." We suggest also indicating a desirable minimum gray reflectance. Digitization is done by people, and people do poorly (both psychologically and in regards to the utility of their vision systems) in extremely dark environments. Institutions that read "60% or less" may assume that "darker is better" and that gray in this context only means "neutral" not "midtone". A medium or dark gray is preferable to a black.	It is up to organizations and operators to determine how dark their viewing environment should be (black is ideal for some situations). Viewing environments can be customized, so this recommendation is too application-specific.	Not Accepted	N/A
Digital Transitions (Doug Peterson)	7/15/2022	2.6.2 Monitor, Light Boxes, and Viewing Booths AND 2.6.6 Lighting. Technology has improved since the previous iteration of this document. We would suggest the minimum CRI for viewing booths and light boxes be elevated to 94, and we would suggest CQS or TM30-15 be provided as a secondary metric as many lighting manufacturers "beat the test" of CRI in their manufacturing decisions, achieving CRI scores that aren't warranted by a holistic analysis of their spectral output. We would also suggest that "A CRI above 90 is generally accepted as appropriate for most cultural heritage imaging" be continued with ", however, when available and within budget a higher CRI/CQS is more desirable.	90 is a reasonable CRI for viewing booths. FADGI doesn't provide evaluation parameters or ratings for viewing systems.	Not Accepted	N/A
Digital Transitions (Doug Peterson)	7/15/2022	"Single exposure total area capture scanning systems are considered the most appropriate technologies when imaging special collections materials, including documents." The use of the word "scanning" here is misleading. The point of this statement, as we understand it, is that instant capture single-shot camera systems are preferable to planetary scanners or other devices that use motion during capture or between multiple captures. Suggest changing "scanning" to "camera" or "instant capture."		Accepted	The word "scanning" was removed from the 7th bullet of the Notes section in Section 3.3 (p. 36) on 10/25.
Digital Transitions (Doug Peterson)	7/15/2022	"Given the lack of calibration targets available for negative films, and appropriate software with which to create calibrations, it is recommended to manually establish scan settings based on highlight, shadow, and midtone measurements of the image being scanned. These settings may need to be changed with every scan, based on the original." We do not agree. Modifying exposure for each image is both impractical, subjective, and removes the ability for the viewer to understand the original nature of the material. We suggest this be expanded to allow for a workflow that uses absolute reference rather than subjective and subject-based decisions. For example "targets for film scanning are less common and less broadly available than for reflective material scanning. In the case that a suitable target is not available at an institution it is minimally acceptable to (insert the workflow you currently suggest here). However, as with reflective materials it is preferable to digitize transmissive materials using targets and profiles to create absolute reference points of tone and color, at least for the master file." Also, we would advocate here for the inclusion of a call for object level targets for transmissive materials so that a target can be included in frame as is the case for reflective material today. This document needn't be only retrospective on current options available but can serve as a call to arms for the community to create new tools where a gap (as noted in this paragraph) exists.	FADGI does not prescribe specific processes - there is more than one way to achieve desired results.	Not Accepted	N/A
Digital Transitions (Doug Peterson)	7/15/2022	"Imaging with narrow band blue light has been shown to increase the resolution and reduce the effects of Newton's rings when film is imaged between glass." We suggest clarifying that this is only applicable for monochrome cameras. A narrow band blue light harms the resolution for a standard Bayer sensor camera. This is clarified in the earlier paragraph but not in this bullet point.		Accepted	Clarification about monochrome cameras added to sixth bullet in the Notes section of Section 3.11 (p. 63).
Digital Transitions (Doug Peterson)	7/15/2022	"X-Ray Film (Radiographs)". This section recommends against the use of "color digital cameras" and for "monochrome cameras with HDR capabilities" - the use of the term "HDR" here might confuse or mislead readers. The core need here is for accurate rendering of tone across a wide range of subject density. Some cameras may use a "HDR" mode which combines multiple raw files while others might use a different sensor mode during the creation of a single raw file.		Accepted	Changed Recommended Technologies in Section 3.14 to include only "specialized cameras that are capable of capturing a high dynamic range (that can achieve a range of 5.0)" (p. 72).
Digital Transitions (Doug Peterson)	7/15/2022	4.1 Camera. "In essence, the true resolution is far less than the stated resolution, and the color is interpolated from the data from four pixels." - as technology in demosaicing continues to improve since the previous version of this document we would advise to remove the word "far" from this sentence. Interpolation always causes loss, but the amount of loss in high-end raw processors such as Capture One CH is now quite small.		Accepted	The word "far" was removed in the second paragraph of Section 4.1 (p. 76) on 10/25/2022.
Digital Transitions (Doug Peterson)	7/15/2022	4.2 Scanner. "To this day, drum scanners provide the highest image quality of all imaging devices" As technology continues to improve we would advise to caveat this statement. Something like "drum scanners outperform most modern imaging devices". For example, the dynamic range and noise of a Phase One back using the dual-exposure or frame-averaging mode is several times better than the noise floor produced by a PMT.		Not Accepted	N/A
Digital Transitions (Doug Peterson)	7/15/2022	5.1.3 Insource vs. Outsource. We suggest a closing sentence be included reading "The recommendations for image quality and the tools and methods to monitor them remain the same whether an image is produced in-house or via outsourcing, and these guidelines and a FADGI star rating are an excellent tool to include in the covenants of any outsourcing contract as they are objective, independent and testable."		Not Accepted	N/A
Michael Spaeth, Kodak Alaris	8/4/2022	However, the sharpness metrics are largely unchanged. Section 2.4.7 renames MTF to SFR and includes a slight narrowing in the allowable range for the SFR50 metric (formerly "MTF50") - increasing the lower limit from 0.35 to 0.40 for FADGI 3-star. The number of SFR metrics are excessive, especially in comparison to the other FADGI evaluation metrics. SFR10 measurements are noisy, easy to undermine with post-filtering and not highly correlated with visible image quality. Interpreting SFR10 metrics is problematic and we would recommend eliminating them from FADGI 2022.	Previous SFR10 removed as requirement - now informative only measure called "SFR at Nyquist." This and other informative measures (not required) are in white rows with light gray text in the tables in Chapter 3 to differentiate them from the required parameters in darker rows.	Partially Accepted	Additional information about SFR metrics, including graphics, added to Section 2.4.8 (p. 14). All references to digital count metrics have been removed. Informative metrics, such as SFR Response at Nyquist Frequency, are "grayed out" in the tables in Chapter 3 (p. 27) to indicate that they're informative only.
Michael Spaeth, Kodak Alaris	8/4/2022	Section 3.4 Documents (Unbound): General Collections includes a sub-section listing "Not Recommended Technologies". This list includes "Pass through manual or automatically fed document scanners" and states that "This class of equipment often introduces streak artifacts in the imaging process, which are not FADGI compliant". This unfairly limits the utility of ADF scanning. When used as directed, these platforms can deliver streak-free imagery and at speeds that far exceed alternate methods. ADF scanners have been used for archival document scanning for decades already. Service Providers have experience in utilizing ADFs to provide streak-free scans. The definition of materials in this category includes "new, clean and easy to handle materials". There is no reason that these materials could not be scanned, FADGI compliant, using an ADF scanner.	FADGI does not consider ADF scanners appropriate technology for cultural heritage materials.	Not Accepted	N/A
Michael Spaeth, Kodak Alaris	8/4/2022	In Section 3.5, Documents (Unbound): Modern Textual Records, the commentary suggests the L* change only impacts OECF Tonescalé & White Balance metrics, but it also impacts the Noise metric test. Noise level is no longer tested against separate R, G, B channels - it is to be tested against a single channel noise calculated in L*. This is described in section 2.4.10 and again in the table in all the sections. However, the comment "This will impact two metrics, OECF and White Balance when using digital image conformance evaluation test patterns" is listed below the table in Section 3.5. It should be changed to read "This will impact three metrics, OECF, White Balance, and Noise, when using digital image conformance evaluation test patterns."		Accepted	Recommended change made in Section 3.5 (p. 41) on 11/15/2022.
Jim Studnicki, Creekside	8/5/2022	A few questions / clarifications requested re: the 2022 Revised Guidelines: Regarding 4" x 5" and larger transmissive film formats: as of August 2022, the largest commercially available imaging system appropriate for what would be considered mass digitization has a native pixel size of 14,204 x 10,652. This means that digitization personnel are unable to capture 4" x 5" films in a single shot at the 3,000 / 2,940 ppi minimum resolution required for FADGI 3-Star. Similarly, an 8" x 10" film or glass plate cannot achieve the proposed resolution specs for 3- or 4-Star in a single shot using this imaging system. Can FADGI please clarify the recommended approach to achieve 3-Star digitization of 4x5 and larger formats for mass digitization? In practice, stitching multiple panels is usually cost- and time-prohibitive on larger projects, and stitching continuous tone photos without introducing undesirable artifacts may be impossible.	Language about the size of the materials has been updated to clarify that 4"x5" materials and larger are a separate category from those 35mm up to anything smaller than 4"x5". FADGI does not recommend a specific approach to achieving results for a given star level, as different processes may achieve the same results.	Partially Accepted	Sections 3.9 (p. 54) and 3.11 (p. 60) updated to read "Transparencies/Negatives 35mm up to 4"x5"". Sections 3.10 (p. 57) and 3.12 (p. 64) updated to read "Transparencies/Film 4"x5" and Larger".
Jim Studnicki, Creekside	8/5/2022	Regarding 3.5 Printer Matter, Manuscripts, and Other Documents on Microfilm: FADGI defines resolution as pixels per inch relative to the microfilm itself and acknowledges that the reduction ratio originally used to create the microfilm may be unknown or lost. By itself this is fine, but in the context of actual projects where source documents are required to be scaled back up from microfilm input output, digitization personnel are often tasked with delivering images with a specific resolution relative to the source documents instead of the microfilm (e.g., 300-400ppi for NNDP newspapers conversions from microfilm). As well, many OCR engines expect input files to be in the 200-400ppi range and may behave differently than expected if they attempt to process an input image showing resolution in the thousands of pixels per inch. The resolution measurement itself may confuse many end users if it is not clear if it relates to the microfilm or the source documents. Can FADGI clarify its recommendations on converting between resolution on film versus resolution of source documents on FADGI-compliant microfilm projects, especially when reduction ratio may be unknown but when a specific resolution of the scaled-up source documents is required?	FADGI does not recommend specific approaches for achieving results. There are many ways to meet requirements, the guidelines do not prescribe a certain methodology to meet requirements.	Out of Scope	N/A
Charlie Vidal, Fujitsu	8/5/2022	PFU/Fujitsu's area of expertise is in capture and digitization of modern paper-based information. Our request for consideration is for change within the 3.5 Documents (Unbound): Modern Textual Records specifications. 3.5 Documents (Unbound): Modern Textual Records - Considerations These documents are categorized as newer, text-based documents with a high contrast between text and background on modern office paper. These documents were created primarily for the information contained in the text, and therefore capture of the text is important. While not requiring a specific star rating, 3.5 Documents (Unbound): Modern Textual Records have the similar specification requirements as the 3.4 Documents (Unbound): General Collections 3 Star rating. The Recommended Technologies for 3.5 Documents (Unbound): Modern Textual Records include ADF or Sheetfed scanners. This technology is the predominantly used scanning technology for these types of documents today. All but the most expensive ADF or Sheetfed scanners struggle to maintain the 3.4 Documents (Unbound): General Collections 3 Star rating, or equivalent specifications. Requiring these similar specifications will increase the cost of scanning 3.5 Documents (Unbound): Modern Textual Records exponentially, with little to no improvement in the digitization and capture of the text information. This, in turn, may potentially impose an undue financial burden on end users that need to meet such standards. PFU/Fujitsu Recommendation: Based on our understanding on the information above, we would like to propose changes for consideration, to the 3.5 Documents (Unbound): Modern Textual Records requirements. Our proposed changes are shown in the column heading "PFU/Fujitsu Recommendation" in the table below. This proposal reduces the specification requirements in areas that would be less important for capturing text-based information in the Modern Textual Records category. NOTE: This recommendation included a screenshot of a table that's not included in this spreadsheet. This can be viewed on the Comments page on the FADGI website here: https://www.digitizationguidelines.gov/guidelines/digitize-technical-comments.html	The values for the evaluation parameters for this category (Section 3.5 - p. 41) are consistent with those for meeting a three star level for Documents (Unbound): General Collections (Section 3.4 - p. 38).	Not Accepted	N/A
Katharine Van Arsdale, Adventist Digital Library	9/22/2022	I see on page 20 of the new edition draft that master file storage is addressed. I reviewed this section today because I was specifically looking for guidance/recommendations regarding master file storage, and I see that the information on page 20 is close to exactly what I need to know...but not quite everything. I wonder if you might fill in the blanks for me. I refer to the paragraph that follows: Master files of all types have permanent value for the digitizing organization and should be managed in an appropriate environment, e.g., one in which read and write executions are minimized and other preservation-oriented data management actions are applied. In contrast, derivative files are frequently accessed by end-users and are typically stored in systems that see repeated read and write executions.	The Guidelines primarily address image quality and digitization processes. The Guidelines make general recommendations on file storage, but it's up to individual organizations/agencies to determine their "failure tolerance" for backing up master and access files.	Not Accepted	N/A
Martina Hoffmann, National Library of Switzerland	10/11/2022	My question is this: How many read/write locked copies of master files do you recommend that a cultural heritage organization keep? My university currently keeps two "back-up" copies of the master and access files that are read/write locked. One is on an NAS, the other on AWS. We try to follow FADGI in all that we do, and we want to know if our file storage is adequate as well. The section I quoted above is so close to addressing our specific question, but it's unclear. Can you clarify? Does the working group intend to suggest that master files be stored in one read/write-locked location? The paragraph above seems to imply that one locked location is sufficient and two or more would be king on the cake. Am I reading this correctly? What is in keeping with the spirit of the standards? On page 4 (Code of ethics - I absolutely love this chapter!) It states that Certain digital enhancements should be avoided such as... excessive cropping - While I do agree contentwise, I am pretty sure the first question I get asked is: What is excessive cropping? I have found in the guidelines no definition about that while it states what cropping means and that it should/could be done in different ways for different purposes. It doesn't state what is meant by excessive.	"Excessive cropping" is somewhat subjective and what constitutes "excessive" may differ depending on the intended end use of the images. The Working Group added "of the image area" to somewhat clarify that this means any cropping that removes content or image data that includes the object itself, as opposed to background surfaces, etc.	Accepted	The language "of the image area" was added to clarify "excessive cropping" on p. 4.

Martina Hoffmann, National Library of Switzerland	10/11/2022	On page 13 2.4.5 Color Accuracy: The whole is technically written correctly, but from the feedback we are getting all the time, people don't understand what it says. I thought it might be a bit too short if you are aiming for not the color scientists or already high end practitioners amongst the community as an audience. Especially the two paragraphs starting with As a general rule ... and Profiling for Printer... might raise a lot more questions than they answer in the first place.	The target audience is practitioners who are implementing the guidelines, not those learning the field in general. There are additional references to other resources within the document, the FADGI site, and elsewhere.	Accepted	Added clarification on terminology and 'color accuracy' in relation to color code values, color profiles, and color spaces to Section 2.4.6 (p. 14).
Martina Hoffmann, National Library of Switzerland	10/11/2022	Somewhere along the same line is my feedback on 2.4.7 on the next page: While I do understand what it says, I am seriously doubting people new to the field or even already working longer in the field but have never had to do with standardization or even digitization in a serious workflow will understand the technical explanation that is given here. I might be a bit pessimistic but this is what I get very often as feedback in conversations.	The target audience is practitioners who are implementing the guidelines, not those learning the field in general. There are references to other resources within the document, the FADGI site, and elsewhere.	Not Accepted	N/A
Martina Hoffmann, National Library of Switzerland	10/11/2022	Also this is the only page (2.4.7) where you are using DPI instead of PPI which I was just wondering about why.		Accepted	"dpi" has been replaced by "ppi" throughout Section 2.4.8 (Section 2.4.7 in draft version - p. 14).
Martina Hoffmann, National Library of Switzerland	10/11/2022	Another thing I love is the SFR Abnormal Behavior: I do understand correctly that this is not there yet? If yes, I would suggest to put it even more clearly that it is not there yet. People in my experience are lazy readers.		Accepted	Section 2.4.8 (p. 14) has been updated to more clearly emphasize that SFR Abnormal Behavior is a metric that's still being developed.
Martina Hoffmann, National Library of Switzerland	10/11/2022	On page 17 under 2.4.15 you are introducing a term "system-level approach" which is not really explained or defined as far as I could see. While I do understand what it means or what you mean by it, it might be confusing for people that use "system" for a different entity. I probably would make a definition or a comparison between a device-level and a system-level approach. It might help people to understand what you mean by a "system-level approach".	This is Section 2.4.17 in the final version of the 3rd Edition.	Not Accepted	N/A
Martina Hoffmann, National Library of Switzerland	10/11/2022	On Page 18 under Rendering Intents I go back to the new users in the field: I highly doubt they do understand what is meant here and how they should use it when they encounter it. It will raise more questions.	This term is discussed in detail on p. 20, and defined in the glossary (Appendix A, p. 126).	Not Accepted	N/A
Martina Hoffmann, National Library of Switzerland	10/11/2022	On Page 20 under 2.5.2. Just for your information: We don't use HCR in Europe. Basically all the people I know of use HTR (Handwritten Text Recognition) instead.		Accepted	HTR added to Section 2.5.2 (p. 22) and the glossary entry for HCR (p. 119).
Martina Hoffmann, National Library of Switzerland	10/11/2022	Under 2.6.1 on page 21 the footnote for CRI is not at the first mention (approximately 5000K...) but on page 22 with the next chapter (2.6.2). I would use the footnote on the first time you mention CRI.		Accepted	Footnote for CRI moved to the first reference to it in Section 2.6.1 (p. 23).
Martina Hoffmann, National Library of Switzerland	10/11/2022	Why do you recommend PDF/A for file formats of master files? It is even more complicated than JPG2000 files to maintain for people and to get the right metadata into the files especially for archival masters. Just curiosity.	This is one of several recommended formats in these guidelines. Organizations and practitioners may choose which works best for them.	Not Accepted	N/A
Martina Hoffmann, National Library of Switzerland	10/11/2022	Two things that I was missing in the guidelines: A general description or recommendation about which material (background) one should digitize and which colors are appropriate for a background. I know in the later chapters, with the tables, there are things said about background pages but it does even state any color to be appropriate. I can basically guarantee that some vendor will come to me with a red background and say it is ok because the guidelines say any color. Also I will encounter countless discussions about black velvet because it is so nice black and swallows all the light (giving a red shimmer when being used but that will be ok because any color is ok following the guidelines) which brings me to the question: Is it possible to say anything about it? Like: Use an appropriate cardboard with L 15 to L 45 or so?	In general, a neutral, uniform background is recommended. The exact color or material will depend on the situation. It's recommended to choose a background that doesn't compete visually with the subject. However these guidelines do not recommend a specific color or material as many options are available to achieve desired results.	Not Accepted	N/A
Martina Hoffmann, National Library of Switzerland	10/11/2022	Another thing that came to my mind was: You are stating in the tables a PPI for each star level and only in the latter chapters (3.8) say something about a relation to an original size. Would it be possible (to make it easier for practitioners) to say something about that relation earlier on or within the tables itself? As people are lazy they will only use the tables and not relate back to the rest of the document.		Partially Accepted	Rather than add reference to "original size" in earlier sections in Chapter 3 (p. 27), references in Sections 3.8 (p. 50) and 7.1 (p. 89) were removed.
Martina Hoffmann, National Library of Switzerland	10/11/2022	Another just for information: on page 27 under 3.1 you don't recommend Linear scanning processes but lots of vendors or machines still use it (at least over here in Europe).		Not Accepted	N/A
Martina Hoffmann, National Library of Switzerland	10/11/2022	On Chapter 4 page 71 and 72 I had the feeling that 4.3. and 4.4. should be subchapters under 4.2. Instead but that could just be my interpretation		Accepted	Information on different kinds of scanners were reorganized to be included as sub-sections of Section 4.3: Scanner (p. 76).