Public Review Comments and Responses for the Minnesota Geospatial Advisory Council Address Point Data Standard V1.3

The Standards Committee of the Minnesota Geospatial Advisory Council (GAC) held a public review period for proposed version 1.3 of the GAC Address Point Data Standard from August 7 to October 12, 2020. Below is a table showing the comments received and responses approved by the Standards Committee on 11/4/2020. Responses include changes to the standard and other actions.

#	Comment	Submitter	Standards Committee Response
	Section 1. Identification Elements		
1	**Comment refers to:** Sec 1.2 note 1, pg8 *If the local address authority or partnering county does not already have a procedure to create a nationally unique ID, this may be accomplished by appending the GNIS unique ID for the city or township (**in the 8-character text with leading zeros Census format**) and a dash to the beginning of the local unique ID.* **Comment:** 1. What happens if a local address authority or partnering county assigns the same local unique ID within two different types of features (say, Address record ID = 1000 and a road segment ID also = 1000)? 2. Want happens if an address authority has no GNIS ID (e.g. a state or federal agency, for an extensive government facility)? **Recommendation:** Consider recommending use of Universally Unique Identifiers (UUID). They provide identifiers that will be unique across suppliers and over time. In addition they will align with practices likely to be adopted in creating the national Address Database (Dan Ross can provide more information on this.) If local authorities do not have the capability to assign, then assignment can be made by the first-level aggregator.	Ed Wells, Retired	It has been the expectation that the GAC recommends the use of UUIDs, but we failed to mention this in the standard. **Action: Modify the language to specifically recommend the use of UUIDs.**

	Section 2. Address Elements		
2	**Comment refers to:** Sections 2.12 thru 2.15 and following note, pp. 11-12. Do the numbers 1 and 2 indicate that, in reconstructing the sender's record, the receiver should place Subaddress 1 and Subaddress Identifier 1 ahead of Subaddress 2 and Subaddress Identifier 2? It would seem logical, but it is not stated explicitly. ***Recommendation 3a:*** If that is the intent, state it explicitly in the element descriptions or the following note.	Ed Wells, Retired	**Action: explicitly state this in the standard.**
3	**Comment refers to:** Sections 2.12 thru 2.15 and following note, pp. 11-12. The examples do not include any cases where the type is absent (e.g, "Mezzanine" without the word "Level"). ***Recommendation 3b:*** Consider adding an example with an ID only.	Ed Wells, Retired	The Standards Committee will review this idea further particularly related to NG 9-1-1 needs and compatibility with the NENA standard. The Committee will consider tweaking the examples for this element in the future.
4	**Comment refers to:** Sections 2.12 thru 2.15 and following note, pp. 11-12. The Location Description, as defined, is not part of the address. It is for descriptive information about the address. Since subaddress types and IDs are part of the address, the Location Description should not be used to hold subaddress types and IDs. ***Recommendation 3c:*** Consider the following; 1. Restricting subaddress information to Subaddress Type and ID items. 2. Perhaps adding items Subaddress Type 3 and Subaddress Item 3. 3. Within this constraint, encouraging local address authorities to present subaddress information as concisely as possible (e.g., "Room 325", instead of "Floor 3", "Room 25"). 4. Noting that this is a necessary cost of the flat file structure.	Ed Wells, Retired	The Standards Committee has discussed this idea and has chosen to keep the standard as-is for now.

5	**Comment refers to:** Sections 2.12 thru 2.15 and following note, pp. 11-12. An exchange standard should enable the receiver to reconstruct the record as it exists in the sender's database. In some cases the Subaddress Type precedes the Subaddress ID; in other cases the Subaddress Type follows the Subaddress ID. Is it important that the receiver know the order? ***Recommendation 3d*:** If important, it is necessary to add an attribute to each Type + ID pair. Following the FGDC name, it would be called "Subaddress Component Order 1" and "Subaddress Component Order 2". The definition is found in FGDC 2.3.8.3.	Ed Wells, Retired	The Standards Committee previously discussed this idea and preferred not to use a subaddress order element.
6	**Comment refers to:** Sections 2.12 thru 2.15 and following note, pp. 11-12. The flat-file structure is simple to understand and less expensive to operate, but it imposes maintenance inefficiencies and headaches, particularly when one address file must serve multiple stakeholders in local, state, and federal agencies. Already the larger jurisdictions, where addressing is most complex, are using relational data structures to manage addresses. ***Recommendation 3e:*** Consider, in future versions of this standard, incorporating relational data structures, and for benefit agencies using flat-file record structures, providing an accompanying informational guidance document that gives best-practice guidance for implementing the relational structures in flat-file format.	Ed Wells, Retired	The Standards Committee will consider this topic in future versions of this and other standards.
7	On page 10, Street Name Pre-Type, highlight the parts that are street pre-types in the examples.	Megan Sisko, State of MN	**Action: highlight the parts that are street pre-types in the examples.**
8	2.12 & 2.13 (subaddress type and identifier)– having these fields as conditional are ideal expectations, but also a high standard and large undertaking to meet	Megan Sisko, State of MN	Understood. The GAC does not mandate or enforce standards. It offers the standards as a resource to the community. Organizations may choose to adopt the standards and require their use internally. Some data producing organizations that choose to comply with this standard do not collect all data included in the standard. Such organizations may choose to work toward full compliance over time. More information could be included in a future best practices guide.

	Section 3. Area Elements		
9	The following 3.X Area Elements descriptors are used: "[for the CTU/county code/county/state] in which the address point is physically located", "for the zip code of the address point"; these describe attribution based on where the address point is physically located, not where the address itself is physically located. This means an address attributed to an address point may not be a real address, but instead just attribution of a point placed on a map. If this is the desire leave as is; if address points should be associated with an actual address, these should be changed to "for the address associated with this address point" or "in which the address (not address point) is physically located".	Megan Sisko, State of MN	The Committee has discussed the pros and cons of using "address" vs. "address point". Each has its merits, but the committee prefers keeping the word "point". More could be explained in a possible future best practices guide.
	Section 4. Functional Elements		
10	**Comment:** Within the draft document, Complete Landmark Name is placed in Section 4 with the Functional Elements. The other functional elements describe the address; they are not used in constructing the address. The Complete Landmark Name is part of the address, so it should be placed in Section 2, Address Elements. **Recommendation:** Move the Complete Landmark name into Section 2, Address Elements.	Ed Wells, Retired	The Committee has discussed the pros and cons of using this idea and prefers keeping the standard as it is. Of note, the Committee recognizes that landmark names are not necessarily part of the official address as defined by the address authority.
11	Light recommendation: 4.7 Centerline Geocodable – remove "very" in the description	Megan Sisko, State of MN	**Action: remove "very" in the description.**
	Section 5. GeoLocation Elements		
12	5.1 and 5.2 (lat/long) – are these the lat/long of the address point or address structure/parcel? Perhaps this was left intentionally vague which would be understandable considering the complexity assigning detail could raise. Perhaps the way this is defined should be consistent with the USNG field description (both leave out detail, ID the address point, or physical location of the address rather than the point).	Megan Sisko, State of MN	The description specifies the latitude or longitude of the "address location". **Action: change "address location" to "address point" to increase clarity.**

	Section 6. 911 Elements		
13	6.1 GIS911POC – this domain identifies only county names but the field description details counties or PSAPs and that this value may use all uppercase. Should the domain be extended to include PSAP codes in addition to county names?	Megan Sisko, State of MN	Per MN Statutes Chapter 403.025, "each county shall operate and maintain a 911 emergency telecommunications system." The governing 9-1-1 authority is the county not the PSAP. Counties designate, in their County 9-1-1 plans, responsible entities for data submission for the county's geographic area. Since counties, at their discretion, may choose (and potentially subsequently change) these responsible entities to submit data on their behalf, there was not an attempt to include separate domain values for all the possible entities that could be acting on a county's behalf (e.g. county GIS department, county IT department, county surveyor's office, county Sheriff's department operating a PSAP, independent entity operating a PSAP, GIS vendor). Tribal entities have their own authority similar to counties. In practical terms, the GIS911POC attribute is useful for identification of the submitter of a geospatial feature provisioned to a dataset aggregated from multiple data sources. **Action: Change the existing text as follows:** The entity responsible for submitting Geographic Information System (GIS) data to the State of Minnesota to be used for NG9-1-1 service for a specified area. ~~This is typically a county GIS department or Public Safety Answering Point (PSAP).~~ In its County 9-1-1 Plan, which is submitted to the Minnesota Department of Public Safety, each county must specify the 9-1-1 GIS Authority/Authorities for each of the required NG9-1-1 datasets that encompass the county's geographic area. Tribal governments have their own authority similar to counties. Entities acting on behalf of a county or tribal government for the submission of GIS data will be attributed with the county or tribal government as the GIS911POC. This element may use all uppercase value. In practical terms, the GIS911POC attribute is useful for identification of the submitter of a geospatial feature to a dataset aggregated from multiple data sources. This change will also be made to the same element in the Road Centerline Data Standard.
14	6.6 & 6.9 Legacy directional fields – NENA's domain requires uppercase (only N, S, E, W, NE, NW, SE, SW)	Megan Sisko, State of MN	Correct. This standard does use the NENA domain for these elements. Per NENA's NG911 Data Model NENA-STA-006.1.1-2020, the domain and only valid entries for Legacy Street Pre-Directional and Legacy Street Post-Directional are: N, S, E, W, NE, NW, SE, SW. When abbreviating directionals in legacy MSAG content, the current legacy 9-1-1 service providers in Minnesota use the abbreviations defined in the NENA standard.

	Section 7. Management Elements		
15	7.2 Effective Date – the description says "this is a conditional – If Available element." This seems confusing to refer to it under two different inclusion types. If this is to be so, also include 'Conditional' in the "Inclusion" box; however, the RCL standard seems to have a more appropriate manner of defining this field.	Megan Sisko, State of MN	**Action: Change this to "optional" and remove the If Available inclusion status from the standard.** **Also remove the If Available inclusion status from the Road Centerline Data Standard and change Effective Date and Impedance Speed to Optional.**
	General Comments		
16	**Comment refers to:** Sec "Sources of This Standard", pg. 5. *The National Emergency Number Association (NENA) and U.S. Postal Service (USPS) were partners in the development of the FGDC standard.* **Comment:** As one of the co-chairs of the Address Standard Working Group (ASWG), which drafted the FGDC standard, I know first-hand that this statement is incorrect. The ASWG was a URISA initiative, undertaken with Census and NENA support. The USPS provided helpful information, but no formal organizational endorsement of the standard. For more detail, see FGDC section 1.7. (pp.12-13) **Recommendation:** Remove the sentence. If desired, replace with information consistent with FGDC 1.7.	Ed Wells, Retired	**Action: Remove this sentence from the standard.**

17	The flat-file structure is simple to understand and less expensive to operate, but it imposes maintenance inefficiencies and headaches, particularly when one address file must serve multiple stakeholders in local, state, and federal agencies. Already the larger jurisdictions, where addressing is most complex, are using relational data structures to manage addresses. ***Recommendation 3e:*** Consider, in future versions of this standard, incorporating relational data structures, and for benefit agencies using flat-file record structures, providing an accompanying informational guidance document that gives best-practice guidance for implementing the relational structures in flat-file format.	Ed Wells, Retired	The Standards Committee will consider this topic in future versions of this and other standards.
18	Page 6 says, "*Example: Address Number is a Mandatory field in this standard. If Address Number values are missing, the database does not comply with the Address Point Data Standard.*" *Recommended change:* "database" → "dataset"	Megan Sisko, State of MN	**Action: change "database" to "dataset"**
19	On page 6, underneath "Conditional", change "Each field" → "Field" to match other descriptions. Also, for this example, preface with "Pre Directional is a conditional field in this standard." Consider making "All addresses on this street…" the last sentence in the example paragraph.	Megan Sisko, State of MN	**Action: Change "Each field" to "Field" for consistency. Change the example paragraph to:** *Example: Pre Directional is a conditional field in this standard. An address on "West Seventh Street" has a Pre Directional of "West". Thus, the Pre Directional field applies to this feature. All addresses on this street are required to have the Pre Directional field populated, but not the Post Directional field.*
20	On page 6, preface the "If Available" example with "Effective Date is an If Available field in this standard."	Megan Sisko, State of MN	**Action: Remove the If Available inclusion status from the standard.**
21	Page 6 says, "Per the FGDC standard, all field values in this standard will use a mixed case format." Suggest adding at the end of this sentence, ", unless otherwise denoted within the field domain values."	Megan Sisko, State of MN	**Action: Add "unless otherwise denoted within the field domain values."**
22	Please more clearly note which field the bottom (last two sections/paragraphs) of page 8 is referring to.	Megan Sisko, State of MN	The Standards Committee feels the language clearly refers to the unique identifier elements on page 8 and will keep the standard as is.

23	Update YesNoUnknown domain so that “Y”, “N”, “U” are the codes and fully spelled out are the values, and update the field width of associated fields to 1; this will help keep local datasets from exceeding maximum NENA field widths, increasing compatibility between the two standards.	Megan Sisko, State of MN	This has previously been discussed by the Standards Committee which prefers the spelled out codes and values for this domain which is used in many GAC standards. The words are easily converted Y, N, U when compatibility with NENA is desired.