



**ISO/IEC JTC 1/SC 2/WG 3
7-bit and 8-bit codes and their extension
SECRETARIAT : ELOT**

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ISO
International Organization for Standardization
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ISO/IEC JTC 1/SC 2/WG 3

ISO/IEC JTC 1/SC 2/WG 3 **N**
9 September, 2000

Title:	Consolidated list of National Body comments on ISO/IEC CD 2375: 1999-11-08 with draft dispositions
Source:	Joan Aliprand and Edwin Hart (US)
Status:	Expert contribution
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Attached is a consolidated list of National Body comments from document SC 2 N3409. We sent an earlier copy of this to the editor to assist him in preparing his disposition of comments. Some comments were accommodated in preparing the reorganization. These are noted in attachment 2 of the document titled, "Reorganized text of ISO/IEC CD 2375: 1999-11-08".

The consolidated list has three parts: (A) general comments, (B) specific comments ordered by clause numbers of the reorganized text, and (C) comments not directly reflected in the reorganized text. This document can serve as a preliminary disposition of comments.

A. GENERAL COMMENTS

1. ACCOMMODATED

General remark: (GERMANY)

This CD is a good starting point for a revision of ISO/IEC 2375. However, the number of open issues must be resolved in a second CD before the FCD stage can be envisaged.

ACCOMMODATED: There is to be a second CD.

General comments. (JAPAN)

Also, effects of one change to other clauses are not well sorted out.

ACCOMMODATED: Second CD has been reorganized and clauses have been consolidated where needed.

General comments. (JAPAN)

Wording should be much straight forward, because expectation is more non-native speaker's requirements in future.

ACCOMMODATED: Revisions have been made to clarify the wording.

General comments (SWEDEN) The CD forms a generally very satisfactory starting point for an updated ISO 2375. The editorial comments given below relate mostly to text kept from the original standard, not to newly-introduced text.

It is however the opinion of the Swedish NB that the text is not ready to be progressed to FCD, but that a new CD is first needed.

ACCOMMODATED: There is to be a second CD.

1. PENDING

General comments. (JAPAN)

The CD 2375 (N3390) does not reflect ISO/IEC JTC1 SC2 N3381 (revised 2 N3290) which is a basic scope of this project. Thus, the CD is not yet fulfilling the project objective.

Requirement 4 (UNITED STATES)

RA principles accepted by SC 2 must be included in the standard

PENDING: Adherence to principles in ISO/IEC JTC1 SC2 N 3381 is an important issue that should be addressed initially by WG3, and by SC2 if necessary. (Also required by the US in its comments.)

Technical comment: SWEDEN

Within SC 2, there has been uncertainty whether a registration proposal must be based on a scheme having some official status, like a national standard; or if completely new schemes can be accepted. Although the latter case has been applied in practice, and can also be deduced from the text of the CD, the matter may need further SC 2 consideration.

The main reason for accepting completely new coding schemes is that it may be desirable to give

schemes of limited use an international recognition through registrations, even if they are not immediately made the base of formal standards. Registration should increase the possibilities to evaluate new schemes before a decision is taken to progress them further to formal national, international or organizational standards.

The decision on this matter, in particular any limiting factors, should be clearly declared in the standard text (not only in its annexes).

PENDING: This point needs to be accommodated in the text.

In the second paragraph, SWEDEN makes the case for continuing the present practice of allowing completely new coding schemes, which are not the basis of formal standards to be registered. Is explicit sanction by SC2 needed?

Continuing the present practice is advisable for another reason: who determines when a scheme has "some official status" and which organizations would be recognized as creators of formal standards?

2. PROPOSED FOR REJECTION

General comments. (NETHERLANDS) The layout as given deviates from that in a large number of registrations. Adopting a new format as normative would force the RA to re-edit and republish almost the whole content of the International Register, not to speak of the need created to correct older SC2 standards.

There is no requirement that the new edition of ISO 2375 be applied retrospectively.

General comments. (NETHERLANDS) But the CD contains no rules for re-editing of existing registrations, which may also be needed anyhow in some cases, like when aligning character names is wanted.

Incorrect. Revision procedures are addressed (Clause 11 in CD = Clause 18 in revision)

General comments. (NETHERLANDS) Expensive changes in SC2 documents cannot be justified if their nature is only cosmetic. In particular, the layout specified is in conflict with that in 646 and 4873. Should a new layout be adopted, then it be introduced in all SC2 standards at the same moment, based on a SC2 decision,

The specification of new layouts for registrations is moot given the recommendations in N 3381. The specification of layouts for coded character sets is an SC2 decision outside the scope of this standard.

3. NOT ACCOMMODATED OR NOT UNDERSTOOD

[General comment] (FINLAND) A number of items need better definition and clarification, e.g. the type of registration and the short name in normative Annex B.

NOT ACCOMMODATED: The definitions may belong in the document "Practice of the Registration Authority."

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[General comment] (GREECE)

Regrettably, we cannot accept some paragraphs of ISO/CD 2375:

Accepting these paragraphs means to us that the registration procedure will become a basket to collect everything that is in the mind of the submitter, without any possibility to correct even obvious mistakes. That will put very much into question the validity of the register and of the registration procedure.

IMPOSSIBLE TO ACCOMMODATE: Need specifics from Greece to respond to this comment.

General Comments - Extra: (JAPAN) May be, there are editorial error there, however, Japan limits it's comments on the very principle matter. Because it is too important than the minor editorial.

NOT ACCOMMODATED: Japan reserves the right to provide further editorial comments (on second CD).

**A. SPECIFIC COMMENTS
(IN ORDER BY CLAUSE OF REVISION)**

Revision Clause 1.2

Introduction: (SWEDEN) "...should not be regarded as procedure to standardize a coded character set - it is not a standardization procedure" could be expressed in a more condensed way.

ACCOMMODATED.

Revision Clause 2.1

Subclause 2.1: (SWEDEN) "... sequences specified in ISO/IEC 2022 as reserved " may be a better wording.

ACCOMMODATED.

Requirement 2 (UNITED STATES) Registration is Not a Fast Path to Standardization

The standard must emphasize that registration is not a fast path to ISO standardization. The body of the standard should explicitly state something like the following text to emphasize the importance of this principle: [proposed text]

ACCOMMODATED.

Revision Clause 2.4

5.3: (CANADA) Points 6.3, A.3, B.1.1 (except B.1.5) seem to contradict this article which seems obsolete.

It seems to us that the intent of the document be that all the information ne [sic be?] in the registry. There are too many mandatory requirements to say that specifications may be specified elsewhere. This article needs to be rewritten.

NOT ACCOMMODATED: This clause is neither obsolete nor does it contradict the clauses cited by CANADA. Clause 5.3 of the CD makes it clear that registration does not define rules for use of the standard being registered. Clauses 6.3, A.3 and B.1.1 etc. define the RA's requirements for the registration application documentation submitted to it.

Subclause 5.3: (SWEDEN) The original wording of this paragraph appears preferable to the new one (except that the last sentence should use "identify" in place of "mention").

NOT ACCOMMODATED.

4. Revision Clause 3

Clause 3: (SWEDEN) ISO/IEC 6937 is mentioned only in subclause B.1.7, and it seems not really needed there (see comment below); the reference to it in clause 3 should therefore be removed.

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ACCOMMODATED.

Reason: In B.1.7 (Clause A.8 *Repertoire* in revision), 6937 is used as an example, and so should not be listed as a NORMATIVE reference. But the references are no longer in Clause A.8.

Further the new edition (:2000) of 10646 should be referenced.

ACCOMMODATED.

Revision Clause 4

[Clause 4] (GERMANY) Definitions:Missing: “For the purposes of this International Standard, the following definitions apply.”

Clause 4 (SWEDEN) The definitions should be introduced by “For the purposes of this International Standard, the following definitions apply:”

ACCOMMODATED.

Also a number of terms are used in the CD which should be defined (like in other standards):

Editorial comment by SWEDEN.

4 (SWEDEN) Position

NOT ACCOMMODATED. “code position” is defined (clause 4.3).

4 (SWEDEN) The term “glyph” is also used, in subclause 10.1. It is however suggested that the term be changed (or excluded) there, and therefore not defined.

NOT ACCOMMODATED. “Glyph” is a term that is used in documents developed under SC2, e.g., in ISO/IEC TR 15285:1998 *Information Technology – An Operational Model for Characters and Glyphs*.

We note that the RA uses the term “character shapes” in N 3381.

5. Revision Clause 4.1

4.1: (GERMANY) combining character: Use definition from 2022.

J-1: Clause 4.1 combining character: (JAPAN) Change this definition from ISO/IEC 10646 base definition to ISO/IEC 2022 base definition.

Rationale: The definition of ISO/IEC 2022 definition is a super set of ISO/IEC 10646 definitions. It is including ISO 6937 type combining characters also. And then, it will be consistent with clause B.1.1.4.3 and Annex H (5th bullet).

Subclause 4.1: (SWEDEN) The 2022 definition of “combining character” should be used, not the 10646 one.

ACCOMMODATED. The ISO/IEC 2022 definition recognizes that a combining character may precede or follow the base character depending on the conventions of the character set. This is essential since ISO/IEC 2357 deals with diverse character sets. HOWEVER, THE REVISION CONTAINS A MORE PRECISE DEFINITION.

Revision Clause 4.4

[4.3] (GERMANY) Replace new definition “code position” by more common usage.

Subclause 4.3: (SWEDEN) It is suggested that the definition is removed, and that the term “code position” in the CD is generally exchanged for the self-explanatory “code table position” (as used in other standards).

PENDING: The “other standards” referenced by SWEDEN must be identified. (The term is not defined in ISO/IEC 2022.)

6. Revision Clause 4.5

(SWEDEN) Coded character set

(GERMANY) coded character set,

A set of unambiguous rules that establishes a character set and the one-to-one relationship between the characters of the set and their bit combinations.

ACCOMMODATED in principle but WG 3 should endorse a change in the definition. The word “respective” should be added to the above definition between “their” and “bit combinations” in the above definition. However, the definition used in the revision is clearer:

A set of unambiguous rules that establishes a character set and the one-to-one relationship between each character of the set and its coded representation (bit combination).

Additional definitions for Clause 4

[4.1] Missing definitions (at least):

(GERMANY) Take these from 2022.

(SWEDEN) Bit combination:

An ordered set of bits used for the representation of characters.

ACCOMMODATED.

(GERMANY) byte.

(SWEDEN) Byte

A bit string that is operated upon as a unit.

ACCOMMODATED in principle. Removed reference to “byte” in Clause

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A.3.2.1.1 and rewrote into two sentences using "7-bit" and "8-bit".

(GERMANY) character,
(SWEDEN) Character

A member of a set of elements used for the organization, control or representation of data.

ACCOMMODATED.

(GERMANY) escape sequence,

A string of bit combinations that is used for control purposes in code extension procedures. The first of these bit combinations represents the control function ESCAPE.

ACCOMMODATED.

(SWEDEN) Graphic character

A character, other than a control function, that has a visual representation normally handwritten, printed or displayed, and that has a coded representation consisting of one or more bit combinations.

ACCOMMODATED.

(SWEDEN) Repertoire

A specified set of characters that are each represented by one or more bit combinations of a coded character set.

ACCOMMODATED.

Revision Clause 5

Clause B.6: (SWEDEN) The Note should be rewritten. Registrations intended for 8-bit coding schemes, in particular those for 8859, normally cover only parts of the respective standards (GO or G1 set). The proper reference to a registration is therefore always the ISO-IR one, although an explanatory information can also be given, e.g. "ISO-IR 199 (G1 set of ISO/IEC 8859-14)".

ACCOMMODATED in part. This clause is describing how to reference a specific registration, not how to reference the character set or part that is the subject of the registration.

Editorial comment:

B.6 (CANADA) "to an exsting" to be fixed to "to an existing".

ACCOMMODATED.

Revision Clause 7.1.1

5.1 (GERMANY) "appointed by ISO" .→ "appointed by the ISO Council" (as previously, cf. 4.1 in 2375:1985).

Subclause 5.1: (SWEDEN) "... appointed by ISO to act "Is this correct? (The current edition of 2375

has "ISO Council".)

ACCOMMODATED to the extent that the organizational body responsible for the appointment of the RA should be specified in this clause. (Revision has "appointed by ISO/IEC JTC 1")

Revision Clause 7.2.5

Clause A.3: (SWEDEN) Like the register itself, the RA's "Practices of the Registration Authority" should be available through Internet. And the term "explanatory" should be removed, since the document will in practice be normative.

ACCOMMODATED in principle.

Revision Clause 7.2.6

Clause A.1: (SWEDEN) It is proposed that the enumeration of standards in the clause is replaced by "... the normative standards specified in clause 3."

PENDING: Since all the standards specified in Clauses 3 and A.1 are "under the direct responsibility of the SC2 Secretariat," the attendance requirement might be reworded to refer to organizational bodies (as in CD Clause 5.1 = Clause 7.2.6 of revision) rather than SPECIFIC standards.

Also, the obligation of the RA to attend the meetings should be clarified: "shall" requires the RA to attend all the meetings.

p.4, A.1 (NETHERLANDS) Why is 8859 included? That IS is only an elaboration of 4873 (level 1).

NOT ACCOMMODATED. The parts of ISO/IEC 8859 are important and widely used standards.

Revision Clause 8

Requirement 1, 1st bullet (UNITED STATES) The registration must not violate the rights of interested parties for a coded character set:

- The Sponsoring Authority shall obtain permission from the developer or publisher of a coded character set to apply for registration of that set. This requirement does not apply to a SA that is a National Standards Body proposing the registration one of its national standards. This requirement is waived if the developer or publisher no longer exists and has no successor organization.

PENDING.

Revision Clause 10.1.1

In Paragraph 6.1,

First bullet: (GREECE) Any committee may be willing to register something, but it should be done in co-operation with JTC1/SC2.

NOT ACCOMMODATED. This clause deals with the initiation of an application for registration. JTC1/SC2 should not have to be a co-sponsor of every registration application from within ISO or IEC. SC2 is responsible for the review phase of registration applications.

In Paragraph 6.1,

Second Bullet: (GREECE) We do not accept this "group within subcommittee" invention.

NOT ACCOMMODATED. This clause is identical to Clause 10.1 (b) in the 1985 edition, except that "ISO" has been updated to "ISO/IEC JTC1".

In Paragraph 6.1,

Fourth Bullet: (GREECE) Only Liaison organizations should be able to register.

NOT UNDERSTOOD: This clause is identical to Clause 10.1 (d) in the 1985 edition except that "or IEC" has been added.

Revision Clause 10.2.1

Subclause 6.2: (SWEDEN) The original layout of this text seems preferable, as a list rather than as numbered subclauses. This will also avoid the repetition of "A Sponsoring Authority..."

NOT ACCOMMODATED. The text in the revision is too extensive. The section on responsibilities of the Sponsoring Authority has been restructured and some new text has been incorporated (based on NSB comments).

Revision Clause 10.2.1.1

6.2.1 (CANADA) Annex G (even if informative) contradicts this statement as understood in Canada: the example is a registration for Georgian sponsored by Ireland. Canada demands that the word "shall" in this clause be changed to a 'should'. We have no problem with the example in annex G provided that it comes from a legitimate sponsoring authority, as it is the case in the actual example.

NOT ACCOMMODATED.

Although the proposal is for Georgian script, the source of the character set is given as the National Library of Ireland, which has at least one book in Georgian in its collection - a translation of James Joyce's *Ulysses*. There is therefore no contradiction: it is appropriate for NSAI to submit an application on behalf of the National Library of the country for which NSAI has jurisdiction. However, this is an artificial example: the National Library has not developed a character set for Georgian.

Revision Clause 10.2.2.2

Subclause B.5.3: (SWEDEN) This subclause duplicates the Note to 6.2.2, and should be removed.

ACCOMMODATED. Amalgamated with text from Note to 6.2.2 into 10.2.2.2.

Revision Clause 10.2.2.4

Requirement 1, 3rd bullet (UNITED STATES) The registration must not violate the rights of interested parties for a coded character set:

- The RA cannot reproduce copyrighted material in the 2375 registry without permission of the owner of the copyright. If the proposed registration is for a coded character set for which ISO is the copyright owner, then no copyright release is required. For all other case, including when the SA is the owner of the copyright, the registration request shall include permission for ISO to reproduce the copyrighted materials in the 2375 Registry.

ACCOMMODATED.

Revision Clause 10.2.2.4

Requirement 1, 2nd bullet (UNITED STATES) The registration must not violate the rights of interested parties for a coded character set:

- If a character set proposed for registration is intended to be a coded character set for a particular application, the Sponsoring Authority shall obtain the endorsement of the developer of that application.

ACCOMMODATED.

Revision Clause 10.2.2.5

Subclause 6.4: (SWEDEN) The meaning of this text is not quite clear. What constitutes “convenient and applicable” conditions? And it appears that it should be the originator (if it is not the Sponsoring Authority itself) that is responsible for the mappings.

PENDING.

Requirement 1, 4th bullet (UNITED STATES) The registration must not violate the rights of interested parties for a coded character set:

- The SA for an existing registration is responsible for deciding whether or no to add a mapping to the registration and for providing that mapping. A mapping for an existing registration may be proposed by the original SA or another organization. If the mapping sponsor is not the original SA for the registration, the mapping sponsor shall obtain permission from the original SA and the developer of publisher of the original coded character set.

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1st sentence ACCOMMODATED by Clause 10.2.2.5. Remainder PENDING.

Revision Clause 10.2.2.6

6.3 (CANADA) The first “shall” shall be changed to a “should” unless Annex E shows the complete forms, which does not seem the case right now (it only contains *sample* forms for charts), If this shall is not changed, accepting this clause is like signing a blank cheque.

PENDING. CANADA is assuming that the “prescribed form” is in this standard, when the CD states that “the layout of the prescribed form shall be available from the Registration Authority” and only samples are in Annex E of the CD.

The corresponding clause of the revision states:

10.2.2.6 A Sponsoring Authority shall prepare an application for registration on the prescribed form in accordance with the “Practice of the Registration Authority” (see clause 7.2.5), Annexes A, B, and C, and forward the application to the Registration Authority.

Revision Clause 11

Annex D: (SWEDEN) The title should be “The Registration Authority’s Joint Advisory Committee (RA-JAC)”.

ACCOMMODATED.

Additional Comment 5. (UNITED STATES) Potential Conflict of Interest

If a member of the JAC also represents the SA, should this member be required to abstain on votes on proposals from his or her SA?

PENDING.

Revision Clause 11.1.1 Note

Note after D.2: (GERMANY) This is evident and should be omitted.

NOT ACCOMMODATED. Note included in Clause 11.1.1 of revision.

Revision Clause 11.3.2

Subclause D.3.1: (SWEDEN) Change to “... clause 8”.

MOOT due to revisions.

Revision Clause 11.3.4

J-10: Clause D.3.3: (JAPAN) It is very questionable whether if RA-JAC can act as a mediator between the Registration Authority and appealing party. Because, in the case of new CD, the most of powers of RA should move to RA-JAC, and RA it self will be just a book keeper, therefore, the most of appeals

might be on what RA-JAG decided or recommended, not what RA do.

NOT ACCOMMODATED. This clause is based on the second point of Clause D.3 of the 1985 edition. It refers to resolution of appeals against a decision by the RA (as specified in Clause 12 of the CD and Clause 9 of the 1985 edition). If this clause did not exist, the RA would be acting as both judge and jury.

This clause does not refer to decisions about the mapping of characters: procedures to resolve differences of opinion between the RA-JAC and SA about mappings are specified in Clauses 13.6, 14.2 and 14.3 of the revision.

Revision Clause 12.1.2

Requirement 4. (UNITED STATES) RA Principles Accepted by SC 2 Must Be Included in the Standard

- CD 2375 does not include the exception that "reference material" is not needed when an ISO or ISO/IEC standard is being registered. This was principle 2.a. articulated by the RA (Registration Authority) in SC2 N 3381. The Japanese NB reemphasized this point at the draft review stage (SC2 WG3 N430). The US believes that this principle is reasonable and that it should be included in 2375.

ACCOMMODATED.

Revision Clause 13 principally

Clause 7 general: (SWEDEN) In this case also, the original list layout appears preferable to numbered subclauses.

NOT ACCOMMODATED. The text in the revision is too extensive, and the text originally in Clause 7 is now in two separate clauses, 13 *Registration procedure* and 17 *Processing of approved application*.

Revision Clauses 13.3, 1st item, 13.3 3rd item, & 15.1.3

Subclause 7.3: (SWEDEN) The subclause and its present Note needs to be rewritten to clearly define, in one continuous text, the two possible registration situations; i.e. coding schemes conforming to 2022, and other schemes. Also "... the presentation practice of " could be more stringent, e.g." ... the presentation practice specified by..."

PENDING.

Revision Clause 13.3, 3rd item

7.3 (GERMANY – major comment) "it shall ascertain that the proposals received meet the presentation practice of the Registration authority". What does "presentation practice" mean? Since this is obviously a crucial requirement, it should be much clearer and more detailed.

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ACCOMMODATED. Clause 13.3, 3rd item refers to clause 7.2.5 which authorizes the Registration Authority to prepare and publish the document *Practice of the Registration Authority*.

Revision Clause 13.3.4th item

[6.1 NOTE] (GERMANY) Preferably, remove note after 6.1. Alternatively, reformulate it to: “For proposals concerning single additional control functions to be represented by the Fs escape sequences, see annex C.” (or equivalent). The last sentence of this note may become a note in annex C itself

ACCOMMODATED. GERMANY is correct: the note dealing with allocation of ESC F_s sequences does not belong in this clause defining Sponsoring Authorities.

The note has been amalgamated into Clause 13.3 on the RA’s examination of applications. The 4th item in the list is a rewording of the note and references Annex B *Criteria for the allocation of ESC Fs sequences*.

Revision Clause 13.4

J-2: Clause 7.4, 2nd line: (JAPAN) “shall indicate” → “should recommend”
“shall indicate” is not clear to many of non-native speaker of English.

ACCOMMODATED in principle: Clause 13.4 in the revision says:

The Registration Authority shall inform the Sponsoring Authority of any changes needed to meet the administrative requirements of Clause 13.3.

(Clause 13.3 is a bulleted list based on Clause 7.3 of the CD.)

The verb “shall” according to ISO/IEC practice means that the action MUST be done. Therefore the proposed change “shall indicate” → “should recommend” was NOT ACCOMMODATED.

[J-2: Clause 7.4] (JAPAN) And also, RA should not change the registration request without an agreement by the SA.

NOT ACCOMMODATED. CD Clause 7.4 does not say that the RA may change the registration request. According to Clause 7.4, the RA tells the SA what changes need to be made (by the SA).

Revision Clause 13.5

J-3: Clause 7.5: (JAPAN) Three months circulation to JAC is too long, it should be less than a month (say three weeks). Unless, total review period might be 6 months plus, it is too long for submitter.

ACCOMMODATED. The technical review period for the RA-JAC is now “not more than 3 months” (Clause 13.5 in the revision). [In practice, the RA-JAC is likely to complete its review in much less than 3 months.]

Revision Clause 13.8

7.6 (CANADA) This clause is very ambiguous: What is the impact of “when appropriate, shall...”? Either comments shall be included or there should not be a “shall”. We propose the deletion of “when appropriate”.

PENDING.

Subclause 7.6: (SWEDEN) The Registration Authority should be allowed to decide to incorporate received comments only after consulting the Sponsoring Authority concerned.

PENDING. But if SA is to be consulted, how is a difference of opinion between RA and SA to be resolved?

Revision Clause 14.3

Requirement 3, 1st and 3rd bullets (UNITED STATES) Mapping Requirements Need Additional Specifications

- The procedures do not address the situation where the supplier of the mapping and the experts reviewing the mapping reach an impasse. Although such an occurrence should be rare, the standard must provide for such an eventuality.
- Users of the mapping for a registration need to be made aware of any controversial or alternate mappings.

ACCOMMODATED.

Revision Clause 14.4

Requirement 5. (UNITED STATES) The SA Must Be Responsible for Creating the Optional Mapping into ISO/IEC 10646.

The RA-JAC is a committee of volunteers who should not be held responsible for creating a mapping into ISO/IEC 10646 for the SA. Although the SA may ask the RA-JAC for assistance with the mapping table, the RA-JAC must not be responsible for creating the whole table unless the RA-JAC agrees to do so.

ACCOMMODATED.

Revision Clause 15.1

Subclause B.1.5: (SWEDEN) The text will need modification dependent on the text of 7.3; see comment above. It should also be noted that “a complete coding system” could contain both control and graphic characters; a Note on this may be useful.

PENDING.

Revision Clauses 13.3, 1st item, 13.3 3rd item, & 15.1.3

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Subclause 7.3: (SWEDEN) The subclause and its present Note needs to be rewritten to clearly define, in one continuous text, the two possible registration situations; i.e. coding schemes conforming to 2022, and other schemes. Also "... the presentation practice of " could be more stringent, e.g." ... the presentation practice specified by..."

PENDING.

Revision Clause A.15.2, 4th item

Subclause B.1.6 fourth bullet: (SWEDEN) The meaning of the text is not clear.

PENDING.

Revision Clause 15.2, 5th item

Subclause B.1.6 fifth bullet: (SWEDEN) Suggested change: "any definitions of..."

PENDING.

Revision Clause 15.2, 7th item

B.1.6, item 7: (GERMANY) What is the difference between a "non-spacing" and a "combining" character?

p.6, B.1.6 (last dot): (NETHERLANDS) Nobody knows what "non-spacing characters" are. They are not included or defined in any coded character set standard.

Subclause B.1.6 sixth [i.e., seventh] bullet: (SWEDEN) "Non-spacing characters" should be removed; such characters are covered by the 2022 combining character definition.

ACCOMMODATED.

Revision Clauses 16.1.2 & 16.2.2

J-9: Clause 12.1.2: (JAPAN) Add one more reason for appeals "Resisterd glyph shape(s), character identification(s) and/or mapping(s) are not acceptable by the Sponsoring Authority.

Rationale: It used be no need of this text because the probability of the changes made by the RA has been low, hut now because of the RA-JAG review, it is higher than it used be. Japan is projecting the most of the appeals might be this case if the CD is approved as it is now.

Note; This is a reason why RA-JAG and AG should be separated.

PENDING: If the principles proposed by the RA in N 3381 are used in CD 2375, glyph shape(s) and character name(s) in the ORIGIN (character set being registered) will be used.

Procedures to resolve differences of opinion between the RA-JAC and SA about mappings are specified in Clauses 13.6, 14.2 and 14.3 of the

revision.

In Paragraph 12, [.1.] (GREECE)

We can not accept subparagraphs 12.1.1 and 12.1.2. These paragraphs are undemocratic. Every member body, liaison organization and, at the end, everyone concerned is eligible to file an appeal. Whether it will be accepted or now, or how it is another issue.

NOT ACCOMMODATED. Subparagraphs 12.1.1 and 12.1.2 are based on Clauses 9.1 and 9.2 in the 1985 edition of ISO 2375.

Revision Clause 16.2.2

p.3, 12.1: (NETHERLANDS) Appeal against what? The current 2375:1985 is explicit in that respect.

ACCOMMODATED. The Netherlands is correct. Clarified by addition of subclauses by type of appeal in revision: 15.1 *Appeals against registration* and 15.2. *Appeals against rejection of application*.

Revision Clauses 16.3 & 10.2.2.2

Subclause B.5: (SWEDEN) The contents of this subclause is mainly additional information to clause 12. B.5.2 should be integrated in clause 12.

ACCOMMODATED.

Revision Clause 16.3 2nd item

Subclause B.5.2: (SWEDEN) second bullet: Change to "... whether or not a character set..."

NOT ACCOMMODATED. The bulleted item in the CD states:

- The coded character set in the proposed registration is incompatible with International Standards, whether or not a character from these International Standards is registered.

ISO 2375 3rd edition has:

-- the registration is incompatible with International Standards, whether or not a character set from these International Standards is registered.

The phrase beginning with "whether or not" makes no sense to the editor. If the application is "incompatible with international standards" then why does matter "whether or not a character set from these International Standards is registered"? It might make sense to have "whether or not the same character set is in a registered International Standard". The text has been simplified in the revision as:

-- the coded character set in the registration application is incompatible with International Standards

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Revision Clause 16.3 4th item

Subclause B.5.2 fourth bullet: (SWEDEN) Add a Note stating that in such cases the name shall be explicitly acknowledged in a suitable way in the Origin field (e.g. "XYZ is a trademark of XYZ Corporation, and is registered in some jurisdictions").

NOT ACCOMMODATED. This item appears to forbid registration of proprietary character sets. However, its inclusion should be reconsidered in light of Clause 10.2.2.4 in the revision.

Revision Clause 16.4

12.2, Note 1: (GERMANY) This note seems superfluous.

Subclause 12.2: (SWEDEN) "Registered mail" is a relic from the earlier standard. Certainly some kind of satisfactory reception verification procedures can be specified. (And Note 1 would not be necessary.)

ACCOMMODATED. Use of fax and e-mail incorporated into the text of Clause 15.4 *Procedure for filing an appeal*.

Revision Clause 16.5.4

Annex D.3.5: (GERMANY) "to edit the documents to be submitted to a vote according to clause 10.3": There is no such clause in this CD (obviously, 12.3 is intended).

ACCOMMODATED.

Subclause D.3.5: (SWEDEN) The RA-JAC, being an advisory committee, can hardly "require" a Sponsoring Authority to change its proposal.

ACCOMMODATED. However, the third edition of ISO 2375 has the RA-JAC doing the editing. Clause 15.5.4 in the revision follows the third edition.

Revision Clause 16.5.2

Subclause D.3.4: (SWEDEN) This text, slightly modified, should belong in clause 8 (or possibly clause 7).

ACCOMMODATED.

Revision Clause 19.3

Subclause B.1.4: (SWEDEN) This text is difficult to interpret, and highlights some lack of consistency in the whole registration framework - see technical comment above.

ACCOMMODATED in principle.

Revision Clause 18.1

Subclause 10.1: (SWEDEN) The Registration Authority should not be authorized to introduce “corrections” to registered character sets, particularly not to its glyphs, unless first consulting the Sponsoring Authority.

ACCOMMODATED. Clause 18.1 in the revision states:

The Registration Authority in conjunction with the Sponsoring Authority shall correct material errors, for example typographical errors and errors in the character shapes (glyphs), as soon as detected.

[Clause 10.1]: (SWEDEN in comment on Clause 4) The term “glyph” is also used, in subclause 10.1. It is however suggested that the term be changed (or excluded) there, and therefore not defined.

NOT ACCOMMODATED. “Glyph” is a term that is used in documents developed under SC2, e.g., in ISO/IEC TR 15285:1998 *Information Technology – An Operational Model for Characters and Glyphs*.

Revision Clause 19.2

Subclause 11.2: (SWEDEN) “...grant a waiver...” is a rather vague wording. The subclause needs stricter phrasing.

ACCOMMODATED. Reference to Clause 19.1 added.

Revision Clause 20

Clause 9 general: (SWEDEN) It should be considered if, in addition to the active withdrawal of support by a Sponsoring Authority, also some kind of periodic review of registrations support should be prescribed

NOT ACCOMMODATED. Clause 9.4 says that the registration remains in the register even if the Sponsoring Authority withdraws its support. An assigned escape sequence and its meaning should NEVER be removed from the register because it may occur in data.

Revision Clauses 20.4 & A.3.1

Subclause B.3: (SWEDEN) This subclause duplicates part of clause 9, and should be shortened.

ACCOMMODATED. [Incorporated into 20.4 and A.3.1]

Revision Clause 20.4.2

Subclause 9.3: (SWEDEN) “Interested parties” is somewhat vague; cf. 7.8.

PENDING. Should be accommodated by adding reference to Clause 7.2.4.

Revision Clause A.2

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B.11 [i.e. B.1.1]: (GERMANY) Change text to: "A registration should be made available in electronic form. The registration authority should preferably choose a format that minimizes potential data interchange problems."

ACCOMMODATED.

Subclause B.1.1: (SWEDEN) PDF is indeed the natural format at present, but it seems it should not be mentioned in the standard; the formats for documents is in general decided by JTC 1.

ACCOMMODATED. The NOTE is redundant, since "electronic format" is included in the text of Clause B.1.1 (A.2 in the revision) Reference to PDF has been dropped.

Revision Clause 7.2.4 and Clause A.2

A.2 (CANADA) Canada believes that A.2 is obsolete. The registration authority shall maintain a list of parties specifically requesting paper copies but it is important that there be a requirement as important as this one that the registry be maintained active with a permanent URL over the Internet. We did not see such a requirement and we demand it. This normative clause of annex A should be revisited in consequence.

Clause A.2: (SWEDEN) This clause was needed in the pre-Internet times, but its contents is now totally outdated. It seems that the clause should specify instead, in general terms, how the register shall be made accessible through Internet.

ACCOMMODATED. Partially revised in accordance with CANADA's comments.

Revision Clauses 20.4 & A.3.1

Subclause B.3: (SWEDEN) This subclause duplicates part of clause 9, and should be shortened.

ACCOMMODATED. [Incorporated into 20.4 and A.3.1]

Revision Clause A.3.2

Subclause B.1.1.1: (SWEDEN) Suggested last paragraph: "Where applicable, the formal standard(s) and/or other sources (like MIME, EDIFACT etc.) for the character set proposed shall be mentioned in the short description or under 'origin'."

PENDING.

Revision Clause A.3.2.2.1

Subclause B.1.1.3.3 [i.e. B.1.1.3.4]: (SWEDEN) Suggested text for the subclause: "Combining characters shall be identified as such, following the character name, by the text (Combining character)". (Since "combining character" is defined in clause 4 there is no need to reference 2022).

ACCOMMODATED (BUT SHOULD NOT HAVE BEEN since this changes names in the source standard).

The wording of subclause B.1.1.3.4 in the CD conforms to the practice for registrations where the combining nature of a character is not apparent from its name (example: <http://www.itscj.ipsj.or.jp/ISO-IR/053.pdf>).

Deletion of reference to 2022 ACCOMMODATED.

Additional comment for J-1 Annex B, Clause B.1.1.3.4 (JAPAN)

Proposed change:

“Combining characters” (as defined in ISO/IEC 2022) shall be identified as such with combining directions (FORWARD and/or BACKWARD) in a note.

NOT ACCEPTED with respect to inclusion of FORWARD or BACKWARD. The relationship of a combining character to its base character is a rule of the standard being registered and is out of scope (CD Clause 5.3).

Revision Clauses A.3.2.2.1 & A.3.2.2.2

Requirement 4, 2nd bullet (UNITED STATES) RA Principles Accepted by SC 2 Must Be Included in the Standard

- The standard should continue to reflect RA principle 2.b., Character shapes and character names of the "ORIGIN" should not be changed. The US believes that it may be confusing to the users if a registration were to have a different set of names from the names in the original document describing the coded character set.

ACCOMMODATED.

Revision Clause A.3.2.2.3

Subclause B.1.1.3.2: (SWEDEN) Suggested text: “Unused positions shall be indicated by the text (This position shall not be used)”

ACCOMMODATED.

Revision Clause A.4.3

Requirement 3, 2nd bullet (UNITED STATES) Mapping Requirements Need Additional Specifications

- Implementers need a soft-copy of the table for implementation.

ACCOMMODATED.

Revision Clause A.4.4

Requirement 3, 4th bullet (UNITED STATES) Mapping Requirements Need Additional Specifications

- The space provided (one cell) for a mapping on the form assumes that where a 10646 mapping exists, it is always a single character; however, some conversions may require the use of combining sequences.

ACCOMMODATED.

Revision Clause A.4.7

Major: (GERMANY)

There is no clear rule of how to proceed if the proposal contains characters that have no equivalent in ISO/IEC 10646. Germany thinks that it must be possible for proposals to contain characters which are at present not part of the repertoire of 10646. (This may be implied by item 2 of 8.5.2, but must be made explicit).

ACCOMMODATED.

Revision Clause A.5

Additional Comment 1. (UNITED STATES) Users of the 2375 Registry need an index by escape sequences into the registrations.

ACCOMMODATED.

Revision Clause A.6

p.6, B.1.7 (NETHERLANDS) Remove last sentence. There are no "non-spacing" characters in 6937 (please consult the 1994 edition or the current CD). Should a character "result" or "be produced" by a sequence of characters, then it is nameless, and thus unidentifiable. Composite sequences are there for mapping to glyphs, and are not characters, as 10646 points out. Only 646:1991 is still being imprecise and should be corrected.

ACCOMMODATED. The wording in CD 2375 is, however, consistent with the 1994 edition of ISO/IEC 6937.

Subclause B.1.7: (SWEDEN) It is proposed that the text following "... obtained by combining the characters of the set..." is removed.

NOT ACCOMMODATED. However, the text used in the third edition has been restored, with "combining sequences" replacing "non-spacing characters."

For graphic coded character sets, the registration specifies only the characters of the set and their coded representations, as shown in the code table of the registration. It does not specify a repertoire of characters which can be obtained by combining the characters of the set, for example by means of BACKSPACE sequences, or of combining sequences.

Revision Clause B.4

Additional Comment 2. (UNITED STATES) The last sentence of Clause C.4 reverses the intent of Annex C. The sentence should read, "Any candidate for such allocation shall first be submitted to this subcommittee as the Sponsoring Authority for escape Fs sequences." rather than ending in "as the Sponsoring Authority for escape sequences other than ESC Fs.", which reverses the intent of Annex C.

ACCOMMODATED.

Revision Clause B.5

Clause C.5: (SWEDEN) Suggested change of wording: "...shall include a complete definition ... used, and also justification ..."

PENDING. Either eliminate the lettering (as proposed by SWEDEN) or begin a new line for each lettered point.

7. Revision Annex C

General comments. (NETHERLANDS) We object to the inclusion of Annex E (normative). This matter has its proper place in a document Practice of the Registration Authority".

PENDING: Will not be accommodated if Annex C in revision remains.

Annex E: (SWEDEN) Pages E1, E.2 and E.3 should be complemented by a Note explaining the shading of the tables, e.g. "The shaded positions correspond to codings reserved in ISO/IEC 2022 for control characters. For registration of character sets not conforming to that standard the shading need not be included."

ACCOMMODATED.

Additional Comment 3. (UNITED STATES) Annex E could be simplified by defining the minimal requirements and then using the illustrations as examples rather than the precise format of the tables.

PENDING.

Revision Annex D

ANNEX G

J-12: Annex G: (JAPAN) Remove this, this sample may mislead a reader of this standard. If sample is necessary, use proven sample.

NOT YET ACCOMMODATED. (Example given in CD was not used in revision because it is artificial.)

Revision Annex F

ANNEX H

J-13: Annex H: (JAPAN) Make any necessary change on this annex after the disposition of comments.

ACCOMMODATED.

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Additional Comment 4 (UNITED STATES) Addition to Annex H
Annex H (which lists the principal differences from the previous edition) needs to note that this edition adds the option of including a mapping to ISO/IEC 10646 in registrations. Even if it is optional, this is a major change to the content of the registry, and it needs to be noted as such in this Annex.

ACCOMMODATED.

C. NOT IN REVISION

CD Clause 6.2.2

6.2.2 (CANADA) We find contradictory a “shall” in this clause with the ending “as it may desire’. What is the intent of such a requirement. We propose to change “shall effect” by “effects”,

NOT ACCOMMODATED. Wording of CD Clause 6.2.2 not included in corresponding Clause 10.2.2.1 of revision.

CD Clause 6.5

Subclause 6.5: (SWEDEN) The consequences of this text is not clear. What means “ultimate authority over the content”, considering e.g. 7.4 and 8.5?

ACCOMMODATED in Clause 8.2 of revision.

8. CD Clause 8.3

J-5: Clause 8.3 1st line: (JAPAN) What does “verify” means? If it does mean “check and advice”, it is acceptable. If it means “check and correct”, it should not be done.

Proposed change: change “verify” to “review”, and add a text at the end “ If necessary, RA-JAC shall provide an advice the sponsoring Authority the review result.”

PROPOSED CHANGE ACCOMMODATED in principle. Clause 14.1 of the revision has “examine” (not “verify’). Other relevant clauses in the revision are:

13.6 The Registration Authority shall inform the Sponsoring Authority of any required technical changes identified by the RA-JAC in its review.

14.3 If the Sponsoring Authority disagrees with the RA-JAC concerns about the mapping, then the Registration Authority shall include the mapping from the Sponsoring Authority and note any alternative mapping recommendations from the RA-JAC in the registration.

Subclause 8.3: (SWEDEN) This obviously applies only when a proposal contains mappings to 10646 (cf. 6.4), which should be stated. Also the words “in fact” appear somewhat unfortunate, implying that the RA-JAC is more capable than the originator of a proposal to identify its characters (which may of course sometimes be the case).

Both items in comment ACCOMMODATED.

CD Clause 8.4

J-6: Clause 8.4, 1st line: What does “note mean? If it means “JAG add a note of (U+)xxxx, then Japan does not agree. If it means “JAC confirm with a SA for recommended (U+)xxxx, it is reasonable.

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Proposed change: change “note” to “review” and add a text at the end “ if necessary, RQA-JAG shall provide an advice the Sponsoring Authority the review result.”

Subclause 8.4: (SWEDEN) The meaning of “... shall note the code position “ is not clear. Does this refer to 10646 identifications in the Note column of the name tables?

PENDING: Since it is unclear what “note” means, it cannot be determined whether these comments are accommodated.

CD Clause 8.4 Note 2

8.4: (GERMANY) Note 2 should be part of normative text itself It should be reformulated as follows: “This shall not infringe upon the Sponsoring Authority’s right to identify the character and to determine its mapping.” (or equivalent).

J-7: Clause 8.4 NOTE 2: (JAPAN) Add following text at the end. ‘Therefore, no change for the character identification and mapping is allowed by RA-JAG. All changes are subject to be accepted by the Sponsoring Authority.

PENDING: Procedures to resolve differences of opinion between the JAC and SA about mappings need to be added.

Subclause 8.4 Note 2: (SWEDEN) This seems to partly duplicate 6.5.

PENDING: Would be accommodated if GERMANY’s proposed change to Note 2 was accepted.

CD Clause 8.5

8.5 (GERMANY) The note of 8.5 should be moved up to 8.4.

NOT ACCOMMODATED. Clause 8.5 and its NOTE both deal with character names .

J-8: Clause 8.5 (JAPAN) change “determine” to “review”, and add a text “If necessary, RA-JAC shall provide an advice the Sponsoring Authority the review result”.

1) change “determine” to “review”

NOT ACCOMMODATED. The RA-JAC only says whether a proposed character name is correct or not. The clause does not allow the RA-JAC to change any incorrect names that the SA has proposed.

2) add a text “If necessary, RA-JAC shall provide an advice the Sponsoring Authority the review result”.

ACCOMMODATED. (Clause 13.6 of revision.)

Subclause 8.5: (SWEDEN) The meaning of “... identified as being identical...” is not clear. Does this refer to some documentation outside the actual registration proposal? Because if one or more proposed names in the registration are not to be found in 10646 it would mean, strictly speaking, that the proposal contains characters not existing in 10646. Is this subclause directed towards mistakes in naming?

PENDING.

9.

10. *CD Clause 8.5 Note*

8.5 (CANADA) We demand the following changes:

There should be two notes. "NOTE" should become NOTE1. This actual note contains a "shall".

Now a note is **always** informative according to JTC1 directives and it can not contain a requirement. the "shall" shall be changed to a "should".

NOTE 2 shall read as follows:

ISO/IEC assigns normative character names in any of the official languages of ISO. Names provided by the sponsoring authority in any of these languages are considered acceptable with regards to note 1.

It is recommended that names be provided in more than one official languages of ISO and that the equivalent in the national language(s) of the sponsoring authority be provided in addition.

PENDING.

CD Annex D

J-11 Annex D: (JAPAN) Add new clause of "Request of the "origin" as stated in the N3381. May be, some consideration on waiver is needed as a practice.

PENDING. A clause on 'Request of the "origin"' does not belong in this annex (which specifies the composition and duties of the Registration Authority's Joint Advisory Committee). A more appropriate location for the proposed clause is Annex B of the CD (= Annex A of the revision). JAPAN is invited to supply proposed wording for the new clause.

CD Annex F

J-4: Annex F: (JAPAN) Fill this annex. It may make relations and intents of the all clauses in clause 7 and 8. And might avoid the confusion of the reader of this CD.

PENDING. (Though need for this may be unnecessary given reorganization.)

Annex for flowchart deleted from revision because the flowchart was not provided in CD.