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Title: Draft US comments on L2/01-279 and related document(CEN/TC304 N1002) *Recommendation from the PTon the Population of the Cultural Register*
Date: February 7, 2002
Status: Personal contribution for consideration of INCITS/L2

The document being reviewed was distributed in this e-mail message:

-----Original Message-----

From: thorgeir@gr.is [mailto:thorgeir@gr.is]
Sent: Sunday, January 27, 2002 8:08 AM
Subject: (CEN/TC304 N1002) Recommendation from the PTon the Population of the Cultural Register

The document being reviewed was designated in the message as:

Doc. No.	TC304 N 1002
Subject/Title:	Recommendation from the Project Team on the Population of the Cultural Register on how to register national specifications
Date of TC distribution:	23. January 2002
Source:	Monica Ståhl Forsberg PT Reviewer
Note:	This document was tabled in the TC304 plenary 3 December 2001 and resolution 5 adopted on it.

The section "Scope — Purpose of PT work" states:

Support national work on registration of local cultural conventions in the European Cultural Registry and the International Cultural Registry.

COMMENT 1: Why is there a European Cultural Registry AND an International Cultural Registry? How will the two be kept in synch? Today they are physically co-located in a single database (as documented in the section *Registry and registration authority*), but this might not always be the case.

COMMENT 2: When a particular concern applies to all or part of Europe, which registry has precedence?

The section "Justification and result" states:

National standardisation bodies are the major originators of input for the European and international Cultural Registry. Reliable information from the registry promotes internationalisation and should be used as the authoritative (descriptive) source by the software suppliers in their definition of default (non-Posix) locales for the localisation of their internationalised code.

ADDITIONAL COMMENT: If existing software for a particular locale does not conform to a proposed registration, yet the user population is delighted with it, how should the issue be resolved?

The section "Registry and registration authority" states:

The authoritative registry shall follow ENV 12005, Information Technology – Procedures for European Registration of Cultural Elements. This European standard was developed by CEN TC304 and has later been transformed by ISO into ISO/IEC 15897, Information Technology – Procedures for registration of cultural elements. The earlier mentioned questionnaire followed the mandatory clauses in these standards and also some extra. Both the corresponding European registry and International registry have DKUUG in Denmark as the Registration Authority and the data is put in the same registry.

COMMENT 3: It should be made clear that the topic of this clause is the **European Cultural Registry** only, and not the International Cultural Registry (which is under the control of ISO). This distinction could be achieved by changing the title to “Registry and registration authority for the European Cultural Registry.”

COMMENT 4: If ISO/IEC 15897 is not identical to ENV 12005 (as suggested by “This European standard ... has later been transformed ... into ISO/IEC 15897”), why was ISO/IEC 15897 used for the questionnaire as well as ENV 12005?

COMMENT 5: It should also be made clear that if differences exist (or later occur) between ENV 12005 and ISO/IEC 15897, ENV 12005 should take precedence.

The section “Registry and registration authority” continues:

According to both ENV 12005 and ISO/IEC 15897 the registration of the data for a specific country must have an Authorized signature on a written application from the relevant country to the Registration Authority. See Annex A.

COMMENT 6: There should be explicit references giving the numbers of the clauses in ENV 12005 and ISO/IEC 15897 that define who is authorized to sign and submit an application for registration.

The section “The procedure to register the National data” exhibits a number of problems.

COMMENT 7: The first paragraph (beginning “To start the registration of the assembled data, ...”) does not give instructions on procedures, but is an update on events. This paragraph should either be marked “informative” or deleted entirely.

The 1st instruction (3rd paragraph) in this section reads:

Print a copy of Annex A of this document and on the paper give the relevant entries. The Authorized person shall sign it. This paper, with a request to register your data according to the relevant standard (ENV 12005 or ISO/IEC 15897) shall be sent to the following address:

COMMENT 8: TC 304 has no authorization to specify registration procedures for ISO/IEC 15897. Because of this limitation, “ENV 12005” must be substituted for “the relevant standard (ENV 12005 or ISO/IEC 15897)”.

COMMENT 9 (on inclusion of postal address in procedures): For ISO/IEC 2375, the standardized procedures reference a Web site where information about the Registration Authority is available. This avoids the necessity to revise the procedures should (a) the current Registration Authority relocate its offices, or (b) ISO/IEC JTC1/SC22 assign the duties of the Registration Authority to another agency.

The 2nd instruction is:

Fetch your data from the WEB and check it to make sure that it is still valid. On request you will be given the URL address and the password to find your data.

COMMENT 10: "from the WEB" – is there a specific URL? To whom does one address the request? If the answer is "the Registration Authority," what is the Registration Authority's e-mail address? (This e-mail address should be an alias for the Registration Authority as an entity, which points to the operational address of the agency that is currently appointed as the Registration Authority.)

The 3rd instruction is:

Give the whole specification a name showing the relevant Language and Country. For Sweden for example the header "Swedish in Sweden" was used.

COMMENT 11: Are there requirements or restrictions on the languages that can be used on the form? For example, could "Swedish in Sweden" have been submitted in Swedish rather than English?

The 4th instruction is:

Put the following header after the name of the specification:
"Administrative information for this specification"

COMMENT 12: If Annex A is normative (as stated), then this instruction is inappropriate. The wording should be added to Annex A.

The 5th instruction is:

Take away the header for (clause) 1 and 2 and leave the rest of these clauses as they are.

and is followed by a set of instructions to change particular numbers on the form to a "Clause <number>" identification scheme.

COMMENT 13: If Annex A is normative (as stated), then changes may not be made to the information on it as part of an application. Any changes should be made through the relevant standards-making procedures.

COMMENT 14: Changes to reference numbers are particularly dangerous in the context of a cultural registry, because renumbering may lead to confusion about what the data element actually is. (The components of Annex A should be called "data elements" rather than "clauses," to avoid confusion with ISO terminology.)

Following the instructions to change particular numbers, Annex A has this sentence:

The total of what was sent for Sweden is shown in Annex B

COMMENT 15: The example from Sweden does not comply with Annex A (which is normative).

The 7th instruction is:

When the Registration Authority gets the data they register it and send it out for comments. For ENV 12005 it is sent to CEN/TC304 Member Bodies, Associated Member Bodies and Liaisons and for ISO/IEC 15897 it is sent to JTC1/SC 22 members and liaisons. The period for comments is three months. If there are relevant comments these are sent to the Sponsoring Authority who may want to change the data. This is in accordance with Clause 4 in ENV 12005 and ISO/IEC 15897.

ADDITIONAL COMMENT: The procedures outlined in this paragraph are completely backwards. A cultural registration MUST NOT appear in the register until it has completed the review process successfully.

COMMENT 16: The references to ISO/IEC 15897 are inappropriate and should be removed. TC 304 has no jurisdiction over ISO/IEC 15897. Applications based on ISO/IEC 15897 must be based upon the instructions in ISO/IEC 15897 or other ISO procedural documents.

ADDITIONAL COMMENT: The 4th sentence begins “If there are relevant comments ...” Who determines which comments are “relevant”? What criteria are used to determine whether a comment is “relevant” or not?

ADDITIONAL COMMENT: The 4th sentence says “... the Sponsoring Authority ... may want to change the data.” If the Sponsoring Authority does not accept a comment, it should be required to explain why the comment was rejected.

ADDITIONAL COMMENT: Who is the arbiter of the accuracy and completeness of the information submitted for registration? If either the Registrar or the Sponsoring Authority is entirely responsible for resolving comments, that body is acting as both judge and jury (an unacceptable situation).

COMMENT 17: No provision is made for corrections or updates to approved registrations.

COMMENT 18: No provision is made for appeals against a rejection of an application for registration.

The first paragraph of Annex A states:

Please specify all data relevant for the Cultural Specification type, indicating non-available data by "not available". Please fill out one form for each Cultural Specification submitted. When completed, please send it to the Registration Authority as listed in clause 4.

COMMENT 19: Does “clause 4” refer to “clause” 4 of this form, or clause 4 of ENV 12005?

COMMENT 20: For each data element on this form, a specific reference to the relevant clause or clauses of ENV 12005 would facilitate use of the form. For example: For data element 2, where ENV 12005 defines the Sponsoring Authority for an application.

COMMENT 21 (editorial): For clarity, replace “it” in the last sentence with “the form”.

Item 11 in Annex A reads:

11. If not for general use, an intended user audience, e.g. librarians:

COMMENT 22 (editorial): “Librarians” are not the only users of library data. Recommended rephrasing is: If not for general use, an intended specialized use, e.g., in library applications.

COMMENT 23: The example in Annex B “Swedish in Sweden” should be revised to comply with Annex A (which is normative). Three examples of non-compliance (there may be others) are:

- 1) The initial data elements are not in the order specified by Annex A.
- 2) “N.A.” is used – Annex A specifies “not available”.
- 3) Data elements not specified in Annex A (e.g., Character set used for representing cultural data in this specification) are included.