Subject: ~~Recommended~~ US Comments on 2002-July-03, draft Disposition of Comments and draft FDIS Text for the Revision of ISO/IEC 2375

From: INCITS/L2

References:

1. draft ISO/IEC FCD 2375: Editors' Disposition of Comments, dated 2002-07-03.
   http://www.evertype.com/standards/iso2375/fcd2375-disposition.pdf
2. draft ISO/IEC FDIS 2375 Text, dated 2002-07-03.
   http://www.evertype.com/standards/iso2375/fdis2375.pdf

~~The editor is giving the US and Japan the opportunity to review drafts of documents for the 2375 FCD Disposition of Comments, and the FDIS text. Here are our recommendations for the US comments on these drafts.~~

Comments on the draft Disposition of Comments

The US thanks the editor for accepting the US comments in the draft Disposition of Comments dated 2002-07-03. However, the US has several concerns with the draft Disposition of Comments and draft FDIS.

1. The US recommends that the editor indicate the changes incorporated as a result of the ISO Central Secretariat comments on the FCD (dated 28 June, 2002) so that the national bodies know the source of several changes. These include:

   a. Move the Table of Contents to page iii.
   b. Combine clause 2 into clause 1, and the subsequent renumbering of the remaining clauses (plus cross-references to clauses in the text and the flowchart).

      The US notes that it would also be helpful to the reader of the Disposition of Comments to give the new (FDIS) clause numbers (e.g., in square brackets) in addition to clause numbers from the FCD in the NB comments and responses. Example: Comment 1 on Clause 7.3 [Now 6.3].

   c. Change the format of the definitions to the current ISO style.
   d. Change the introduction to clause 3 [now 2], Normative references, to conform to Clause 6.2.2 of the *ISO/IEC Directives, Part 2*.

      The US notes that the introductory paragraph in Clause 2 [formerly Clause 3] is not in conformance with Clause 6.2.2 of the *ISO/IEC Directives, Part 2* as requested by ISO. Please use the text specified by ISO.

      The following referenced documents are indispensable for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

   e. For the ISO/IEC 646 reference, replace "Information processing" with "Information technology".
   f. For the ISO/IEC 6937 reference, replace the 1994 date with the current edition date of 2001.

2. For J-3 Annex D, the Disposition (which was Accepted in principle) ends: "… Clause A.1.2.1 will be changed slightly to reflect this." The US recommends that the editor replace that sentence with the following explanation.

   The reference to "8-bit (single octet) coded graphic character sets" was deleted from Clause A.1.2.1.1, and a new clause (A.1.2.1.3) on graphic character sets non-conformant to ISO/IEC 2022 was added.

   The US believes that the new A.1.2.1.3 clause should be entirely rewritten, because by implication, it improperly restricts the scope of "coding systems not conformant with ISO/IEC 2022" covered in clause B.1 to 8-bit codes. Such coding systems are not restricted to 8-bits. Moreover, the IBM series of 8-bit EBCDIC code tables are not conformant with ISO/IEC 2022 and have a different shape than ISO 8-bit code tables (because of the locations for the control characters). The US recommends the following new text as a replacement:

   The layout of code tables for coding systems not conformant with ISO/IEC 2022 (see Annex B.1) is not defined by this international standard. However, Annex D.6 provides an example layout for an 8-bit code not conformant with ISO/IEC 2022.

3. For comment J-4, the US recommends that the editor add additional explanation.

   As a result of comment J-4, the term "may" was changed, where appropriate, to "should" to clarify the meaning. In the third paragraph of Clause 12.6 [formerly 13.6], the verb "may" indicates that use of this paragraph is optional. Contrast this with the first paragraph of the same clause where the verb, "shall", indicates that the first paragraph is mandatory. However, the term, "may", is not specified in "Annex G (normative) Verbal forms for the expression of provisions" of *ISO/IEC Directives, Part 2, Rules for the structure and drafting of International Standards*. We have therefore changed the verb in the third paragraph of Clause 12.6 from "may" to "should". Whether the third paragraph of Clause 12.6 is ever utilized is entirely at the discretion of the Registration Authority. This means that removing the mapping for separate consideration is preferred but not required.

   In addition, the editor reviewed all instances of "may" and decided that replacing "may" with "should" is grammatically appropriate in the second sentence of Clause 12.7.

4. For J-6, the difficulty is that the title used for Clause 13 [formerly 14 in the FCD] is inconsistent in the FCD (and also in the FDIS). The title of this clause is different in each of the three places where it appears:

Table of Contents	Technical review of mapping to 1SO/IEC 10646
	[J-6 also noted the numeral 1 typo in "1SO"]
In the text	Evaluation of mapping to ISO/IEC 10646
In Appendix G	Technical review of registration applications

   The US recommends that the editor *Accept in Principle* comments J-6 and J-21, and change the title of Clause 13 [formerly 14] to "Technical review of mapping to ISO/IEC 10646" in all three places in the FDIS.

5. For J-7, the editor changed the title of Annex A, but did not use the wording suggested in J-7. The disposition should therefore be Accepted in Principle (rather than Rejected). The US suggests the following replacement for the explanation:

The title of Annex A has been changed to "Details of registrations in the International Register" to avoid confusion with the FDIS Clause 4 (formerly 5), which has the title "International Register".

6. Comment J-11 requests adding a space for "JTC 1" and "SC 2". According to our reading about the practice in the JTC 1 procedures, the Japanese NB appears to be correct.

   Therefore, the US recommends that this comment be Accepted and the text changed accordingly. The editor could either use the NBSP character or manually fix the typographic line-break difficulties when they are encountered. If the editor chooses not to change the text, then the comment should be Accepted in Principle to recognize the validity of the Japanese NB comment.

7. For J-13, the editor accepted the comment but did not change Clause 10.1.1 [now 9.1.1]. The US requests the editor to change "member body" to "national body" so that the FDIS text agrees with this Accepted comment.

8. For J-17, the US recommends that this comment be Accepted in principle (rather than Accepted) because the document citation appears to be incorrect. In Clause 16.5.4 [now 15.5.4], the relevant document needs to be changed to the "*Procedures for the technical work of ISO/IEC JTC 1*". The editor also needs to change the last citation in Clause 3 [now 2] to:

   Procedures for the technical work of ISO/IEC JTC 1. http://www.jtc1.org/directives/main.htm

9. For J-19, the US recommends that the editor describe the changes made.

   Because annex D.3 with the 8-bit code table was moved to the end of annex D, "annex 0" was replaced with "annex D.4" and "annex D.6" was updated with "annex D.5".

10. For J-20, the US recommends that the FDIS text in Annex A, Clause A.2.11 for bullets 2 and 4 be amended to include the changes to the names of the control characters described in the disposition of this comment.

11. For comment J-21, the US recommends that the comment be Accepted In Principle for the reasons cited under its comments on J-6.

Editorial Comments on the draft FDIS

The US has the following editorial comments on the draft FDIS dated 2002-07-03.

12. Add a sixth item to the bulleted list, for clarification of existing requirements. The US recommends the following text:

    – When an application for registration includes a mapping to ISO/IEC 10646, the mapping shall be in machine-readable form and shall meet the other presentation provisions of Annex A.2.

   Rationale: This provides additional clarification for the requirements for the mapping. The RA needs to decide if the mapping meets the presentation requirement *before* the RA-JAC reviews the mapping for technical content. Also, if a mapping were submitted on paper only, the current text in clause 12 does not discuss allowing the RA to ask the SA to supply the mapping in machine-readable form. (The RA should not be obligated to prepare a

machine-readable version of a mapping table submitted on paper. The SA should always be responsible for supplying the machine-readable version of a mapping.)

13. In Clause 11.1.2, change "(see annex A.1.2)" to "(as specified in Annex A.1.2)".

   Rationale: Consistency with the wording of Clause 11.1.3 and also to emphasize the requirement for conformity with the provisions of the Annex. The phrase "(see annex B.1)" in this Clause does not need to be altered, because it is merely a pointer to more information, and does not imply conformity.

14. In Clause 11.1.4, change "(see annex A.2)" to "(as specified in Annex A.2)."

   Rationale: Consistency and to obligate the Sponsoring Authority to follow the normative provisions of A.2 when providing a mapping.

15. In Clause A.2.5, replace the sentence in parentheses with this sentence and remove the parentheses:

   In addition to the required machine-readable copy of the mapping, a registration application should also include a printed copy.

   Rationale: Clarification. The distinction between "shall" and "should" may not be apparent to all users of this standard. The replacement text indicates that the machine-readable copy is required and that it is recommended that the SA also submits a printed copy of the machine-readable version.

16. Change the title of Annex E from "Example mapping table" to "Example of a mapping table."

   R*ationale:* To follow the style of the title of Annex D.6.

17. In Annex G, change "ISO supervisory body" to "ISO/IEC supervisory body".

18. In Annex G, in the right column, add closing quote at the end of the bullet beginning with "The term non-spacing character …".

19. In Annex G, in the right column, the bullet starting with "The possibility to attach …" does not begin with a sentence like the other bullets. Replace this phrase with the following text:

   The registration documentation required for coding systems not conformant with ISO/IEC 2022 has been reduced.

20. References in the text show "clause" and "annex" as either titlecase or all lowercase. The lowercase occurrences (e.g., "clauses 9.2.2.3," in Clause 11.1.3) should be changed to titlecase.
   Rationale: ISO/IEC Directives, Part 2, Clause 6.6.7.3 *References to elements of text*.