Universal Multiple-Octet Coded Character Set
International Organization for Standardization

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Title: Comments on IRG P&P Version 9 (IRG N2153)

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This document provides feedback on the latest confirmed version of the IRG P&P (*Principles & Procedures*) document, Version 9 (aka IRG N2153), per *Recommendation IRG M47.7* in IRG N2180.

The comments below are specifically intended to 1) de-emphasize the encoding of new CJK Compatibility Ideographs, on the grounds that WG2 and UTC are very much opposed to encoding new ones, due to the effects of normalization and the subsequent need to add standardized variation sequences to accommodate them; and 2) more strongly encourage the registration of IVSes (*Ideographic Variation Sequences*) in a new or existing IVD (*Ideographic Variation Database*) collection as the preferred way to treat unifiable characters that might otherwise be added as new CJK Compatibility Ideographs:

1. I recommend that the IRG not burden itself by registering and maintaining its own IVD collection, and should instead strongly encourage member bodies to register their own IVD collections. IVD collections tend to be targeted for specific purposes, such as for a particular language or region, and may be designed to support a particular standard. If the IRG were to register an IVD collection in which the registered IVSes come from a variety of member bodies, implementers are guaranteed to become confused. In addition, the IRG is already overburdened with the very important task of encoding new CJK Unified Ideographs. If a particular character is important enough to a member body, in terms of preserving in "plain text" its distinction from the character with which it is unified, the member body needs to be sufficiently motivated to go through the process of registering their own IVD collection. The IVD Registrar (aka me) attends IRG meetings on a regular basis, and is available and willing to provide assistance to member bodies in the registration process, during or between IRG meetings.

2. Add the following new paragraph to the end of Section 2.2.1.c at the top of page 6: "Please be aware that WG2 accepts new CJK Compatibility Ideographs only under very extreme circumstances due to the effects of normalization and the need to add standardized variation sequences to accommodate them. The preferred method of treating unifiable characters whose distinctions are deemed important is by registering them in a new or existing

IVD (*Ideographic Variation Database*) collection as new IVSes (*Ideographic Variation Sequences*). See Section 2.2.1.g."

3. Add the following new inline heading (in bold) and text as Section 2.2.1.g on page 8: "**Ideographic Variation Database (IVD)**. Member bodies are strongly encouraged to treat unifiable characters, which may be present in an IRG working set and identified as such, by registering them as IVSes (*Ideographic Variation Sequences*) in a new or existing IVD (*Ideographic Variation Database*) collection according to the procedures described in UTS #37 (*Unicode Ideographic Variation Database*). The IRG will approve and authorize the registration of the IVSes in a new or existing IVD collection, thereby avoiding any registration fee."

4. Change Section 2.5.2.a at the bottom of page 11 from "Withdraw the *duplicate* ideograph and *map it* to the existing standardized or working set ideograph" to "Withdraw the *now-unified* ideograph and *add a new source reference* to the existing standardized or working set ideograph, *particularly if the existing standardized or working set ideograph to which it is unified does not yet have an assigned source reference that corresponds to the member body that submitted the now-unified ideograph*."

5. Change Section 2.5.2.b at the bottom of page 11 from "Submit the ideograph as a compatibility ideograph character" to "Register the now-unified ideograph in a new or existing IVD (*Ideographic Variation Database*) collection as a new IVS (*Ideographic Variation Sequence*), particularly if the existing standardized or working set ideograph to which it is unified already has an assigned source reference that corresponds to the member body that submitted the now-unified ideograph."

6. Remove Section 2.5.2.c at the bottom of page 11, because it is functionally identical to 2.5.2.a and therefore superfluous.

7. Change the additional text in Annex F A.6 on page 28 from "If Compatibility, *does the submitter have the intention to register them as IVS*" to "If Compatibility, *the submitter is strongly encouraged to instead register them as new IVSes in a new or existing IVD collection*," and remove the question mark at the end of the sentence.

That is all.