

**Draft Comments on ISO/IEC 15897:200? Draft (dated 2001-07-01)**  
**US National Body (NCITS/L2)**

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## **General comments:**

### **TERMINOLOGY USED IN THESE COMMENTS:**

Because "clause" has a special meaning in Annexes D and G of this proposed standard, these comments generally refer to the numbered sections ("clauses" in the ISO/IEC sense) of this standard as "Sections" rather than "Clauses."

### **US NATIONAL BODY CONCERN OVER POTENTIAL CONFLICT OF INTEREST**

It is vital that cultural specifications be reviewed by those who represent varying viewpoints. Existing cultural specifications registered under ISO/IEC 15897 have often been written by the editor of this IS, and often accepted into the registry by the same person. This is a serious conflict of interest. The rules of the registry must be written such that a person who writes or proposes a cultural specification is not also the person who decides whether it is accepted. Further, the registration authority must be made up of representatives from different geographic areas and representing different interests (for example, industry, standards committees, government agencies).

### **GENERAL EDITORIAL**

#### **Problem:**

This proposed standard lacks a normative glossary of the terminology used in it. For example, what is a "cultural specification"?

#### **Action:**

Add a new section containing terms and their definitions.

### **GENERAL OBJECTION**

Section: FORWARD and multiple other places in the text

#### **Current text:**

"This International Standard registers amongst other items Cultural FDCC-sets, charmaps and repertoire maps as defined in ISO/IEC TR 14652, . . ."

#### **Problem and Action:**

14652 has not been approved as a TR, so it is inappropriate to refer to it in this document. Remove the reference to ISO/IEC TR 14652 here and elsewhere in this draft.

### **GENERAL REQUIREMENT**

The editor shall use ISO/IEC CD 2375.2 (approved 2001-03-14) as a model for arrangement and content.

## **SPECIFIC COMMENTS:**

### **EDITORIAL # 1**

Section: INTRODUCTION

#### **Current text:**

"Cultural differences throughout the world make it necessary to adopt IT-equipment to each local culture. Standard methods, being developed by ISO/IEC JTC1/SC22, make such adoption easier. . ."

#### **Problem and Action:**

The requirement is to \*adapt\* computers and IT equipment, not \*adopt\*. Change the wording to "...make it necessary to adapt IT equipment..." and "...make such adaptation easier..."

### **OBJECTION #2**

Section: INTRODUCTION

#### **Current text:**

". . . This edition of the International Standard adds support for ISO/IEC TR 14652, SGML and other techniques meant for machine processing, and opens up the possible Sponsoring Authorities."

#### **Problem and Action:**

As noted previously, remove incorrect references to ISO/IEC TR 14652. Also, rewrite the end of the sentence as "...and opens up the possibility of Sponsoring Authorities" which presumably is what the text means to say.

### **OBJECTION #3**

Section: INTRODUCTION

#### **Current text:**

"...registered cultural elements will also be freely available on the network at the address <http://www.dkuug.dk/cultreg/>. This will make information on cultural conventions freely and easily available to producers in the IT market. Some of these conventions can even be implemented automatically by downloading the formatted specifications."

#### **Problem and Action:**

While DKUUG is the initial maintainer of these cultural definitions, that could change over time, so it seems inappropriate to list the address here in the Introduction. Thus, the sentence should end "...will also be freely available."

Also, remove the last sentence ("Some of these conventions can even be implemented automatically..."). This is incorrect. Software has to interpret the formatted specifications; simply downloading them doesn't automatically implement them.

### **OBJECTION #4**

Section: 1 SCOPE, 1st paragraph

#### **Current text:**

"This International Standard specifies the procedures to be followed in preparing, publishing and maintaining a register of cultural specifications for computer use, including freeform narrative cultural elements specifications, POSIX Locales and Charmaps conforming to ISO/IEC 9945-2, and FDCC-sets, charmaps and repertoire maps as defined in ISO/IEC TR 14652, and SGML. The registry is in printed and electronic form, and the text of the cultural specifications are recorded in a way that is independent of any coded character set."

**Problem and Action:**

There are multiple problems with this text. Based on the contents of the entire document, the IS specifies the information that may appear in a cultural specification, and also defines the procedures for \*registering\* such specifications. It does not specify how to prepare or maintain the specs. Also, this should not refer to 14652, as explained previously, and it is not true that the text of cultural specifications is independent of any coded character set. Clause 6.4 states that "The coded character set ISO/IEC 646...shall be used to represent text for the submitted files."

Because of all this, rewrite this paragraph as follows:

"This International Standard specifies the information that may appear in a cultural specification and defines the procedures for registering such specifications. The cultural specifications may include freeform narrative cultural elements specifications, POSIX Locales and Charmaps conforming to ISO/IEC 9945-2, and SGML. The registry is in printed and electronic form."

Note: I will not specifically call out further references to ISO/IEC TR 14652, but they must be removed.

**OBJECTION #5**

Section: 1 SCOPE, last paragraph

**Current text:**

". . . Registered items using certain POSIX formal specification methods can also be used by the POSIX Operating System and other software capable of using such specifications."

**Problem and Action:**

There is no such thing as \*the\* POSIX Operation System. Revise the text as "...can also be used by POSIX-conformant Operating Systems and other software..."

**OBJECTION #6**

Section 2: Normative References

**Problem:**

The preamble of this section says: "For dated references, subsequent amendments to, or revisions of, any of these publications do not apply." Yet the preamble also says: "For undated references, the latest edition of the normative document referred to applies." Over time, this will guarantee that some data elements in the standard will be obsolete, whereas others (which also have dates, although not published in this standard) will be up-to-date. This is asking for trouble.

**Action:**

The specific edition of every normative reference should be given. This means showing the date of a standard or the date of each part where a standard has multiple parts. Corrigenda and Amendments MUST be cited, since they are an integral part of a standard.

Unclear text. Revise as "For dated references, any revisions of, or subsequent amendments to these publications do not apply."

#### **OBJECTION #7**

Section 2: Normative References

Problem: An obsolete edition of ISO 8601 is cited.

Action: Cite the current version, i.e., ISO 8601:2000.

#### **EDITORIAL #8**

Section: 3 DEFINITIONS

##### **Current text:**

"3.5 Cultural Convention: A data item for computer use that may vary dependent on language, territory, or other cultural circumstances."

##### **Problem and Action:**

Change "dependent" to "depending".

#### **OBJECTION #9**

Section: 3 DEFINITIONS

##### **Current text:**

"3.7 Narrative Cultural Specification: A narrative description for computer use of culturally dependent information, further described in 6.2."

##### **Problem and Action:**

How does a computer use any narrative description? Of course, it doesn't. Software engineers use the descriptions to write software that does the right thing no matter what the user's language or cultural preferences. A better definition is "A narrative description of culturally dependent information. Such information may be useful when designing computer systems and software. See Clause 6.2."

#### **OBJECTION #10**

Section 4: Registration Authority

##### **Problem and Action:**

It is vital that cultural specifications be reviewed by those who represent varying viewpoints. Existing cultural specifications registered under ISO/IEC 15897 have often been written by the editor of this IS, and often accepted into the registry by the same person. This is a serious conflict of interest. The rules of the registry must be written such that a person who writes or proposes a cultural specification is not also the person who decides whether it is accepted. Further, the registration authority must be made up of representatives from different geographic areas and representing different interests (for example, industry, standards committees, government agencies). Although DKUUG is

to be congratulated for volunteering to be the Registration Authority, a group with more varied backgrounds and expertise must take on this task for the registry to be successful.

### **OBJECTION #11**

Section: 4 REGISTRATION AUTHORITY

#### **Current text:**

"The Registration Authority shall maintain a register of Cultural Specifications and their numeric and token identifiers."

#### **Problem and Action:**

The Authority is maintaining a *\*registry\**, not a *\*register\**. Also, what are token identifiers and why are they used? Section 6.8 mentions what a token identifier will be for some items, but does not define what a token identifier is.

Add information at an appropriate place in this document about what a token identifier is, why it is used, and how it is assigned. Add a reference in Section 4 to this information.

### **OBJECTION #12**

Section: 4 REGISTRATION AUTHORITY

Current text of item c):

"in the case of a POSIX Locale, to ascertain that the POSIX Locale and the corresponding Narrative Cultural Specification are not in contradiction;"

#### **Problem and Action:**

What if the two do contradict each other? Suppose there is a "foo" POSIX locale definition, and a "foo" narrative cultural spec. Suppose the cultural spec includes <a-acute> in the character set list, but the locale does not include it in the <alpha> class. Now what? Which is considered wrong? Is one rejected, or asked to be revised? What if the locale was registered a few years ago, and changing attitudes now make the fact that <a-acute> is not included obsolete? To give a concrete example, locales from the early 1990s often include a limited repertoire of characters -- Western European ones may only include a subset of ISO 8859-1 characters. Locales (or cultural specifications) written now often take a broader definition of what should be included. Under this clause, is one of these wrong? What must be done? Should the older one be marked obsolete? What about users who depend on it?

The existing text is incomplete and vague about the Registration Authority should do if a contradiction exists. More information must be added -- once decisions about what happens have been made.

### **OBJECTION #13**

Section: 4 REGISTRATION AUTHORITY

Current text of item g):

"to assign to the Cultural Specification appropriate token identifiers based on the information given by the Sponsoring Authority,. . ."

**Problem and Action:**

Again, what are token identifiers and how are they used?

**OBJECTION #14**

Section: 4 REGISTRATION AUTHORITY

**Current text of item j):**

"In the case of comments, to optionally receive from commenters text to be added to the registration as comments."

**Problem and Action:**

This text is unclear. Who can submit comments? The Sponsoring Authority only? The original author(s)? Anyone? If comments are submitted, is the Registration Authority required to accept and include them, or can they reject some comments? If so, on what basis do they decide to accept or reject comments?

Information must be added here that explains who can submit comments, and what the Registration Authority can do with those comments.

**OBJECTION #15**

Section 4 Registration Authority, last paragraph

**Problem:**

The paragraph describes restrictions on registration rather than on the functions of the Registration Authority.

**Action:**

There needs to be a new section to describe restrictions on the Register and maybe even its structure. The last paragraph of Section 4 belongs in this new section. The new section should answer questions such as:

How should the RA handle a registration request that is identical to one already registered? Duplication is mentioned in Section 4 (g), but there is no specification as to what constitutes duplication (unlike CD 2375.2, where it is spelled out in Annex B).

Can a Sponsoring Authority later decide to deprecate one registration in favor of a new one? Deprecation is not mentioned at all in the current draft. Indeed, the wording of the final paragraph of Section 4 suggests that deprecation may not be allowed ("shall never be changed or deleted").

**OBJECTION #16**

Section 4 Registration Authority

**Problem:**

The processing of applications for registration is insufficiently specified.

**Action:**

Restructure Section 4 and add new **clauses** as follows:

Make Section 4 more general, modeling the text on 7.2.1, 7.2.2 and 7.2.3 of CD 2375.2. The detailed description of the processing of applications for registration belongs in a new section (following Section 6).

## **OBJECTION #17**

Section 4 Registration Authority

### **Problem:**

Procedures for making a change to an existing registration are insufficiently specified.

### **Action:**

There needs to be a new section on changes, specifying (a) exactly when changes may be made to an existing registration (what does "except for name additions" mean?) and (b) when a new registration is necessary. For parallelism with CD 2375.2, this new section should follow Section 7.

### **Comment:**

The first sentence in the last paragraph of Section 4 ("The contents of an individual registration shall never be changed or deleted once it has been registered (except for name additions).") suggests that a new number must be assigned even when purely editorial errors are being corrected. This is overkill: such corrections should be handled through date versioning (which is what is done for ISO/IEC standards).

## **OBJECTION #18**

Section 4 Registration Authority

### **Problem:**

The proposed standard fails to define when an application for registration duplicates an existing registration. Section 4(g) states: "...unless the Cultural Specification is identical to one already registered, ..." with no additional details.

### **Action:**

Add a new Section or normative annex specifying the rules to be used to determine whether an application for registration duplicates an existing registration. This Section should also address the situation when an application duplicates all or part of an existing registration, but also contains entirely new information.

## **OBJECTION #19**

Section 4 Registration Authority

Problem: No provision is made in the proposed standard for withdrawal of a registration.

Action: Add a new **clause**, modeling the text on **Clause 19** of CD 2375.2.

Rationale: A standard needs to cover all contingencies.

## **EDITORIAL #20**

Section 4 Registration Authority, paragraphs 3 and 4

### **Problem:**

These paragraphs give the name, address, etc. for the current Registration Authority for ISO/IEC 15897. If the Registration Authority is reassigned, the standard will have to be revised.

**Action:**

Delete the 3rd and 4th paragraphs ("The initial Registration Authority ..." through "http://www.dkuug.dk/cultreg/") to eliminate the need for revision.

**Rationale:**

Information about organizations serving as Registration Authorities is maintained by ISO on its Web site. The co-editors of the revision of ISO/IEC 2375 realized that if a standard includes explicit details about the organization serving as the Registration Authority, the standard would have to be revised whenever the Registration Authority changes. They therefore requested ISO to guarantee a permanent URL for the list of Registration Authorities. (Although a change in the Registration Authority may seem unlikely for this particular standard, ISO/IEC standards need to be consistent.)

**OBJECTION #21**

Section 4 Registration Authority

**Problem:**

This proposed standard fails to identify the ISO/IEC body responsible for the supervision of the Registration Authority.

**Action:**

A **clause ???** (comparable to **Clause 6** of CD 2375.2) is needed to specify which part of JTC1 has administrative responsibility for the standard and for the register.

**EDITORIAL #22**

Section 4, item f)

In item "f)", change "revised proposals" to "a revised proposal". (Comments pertaining to a particular proposal will be incorporated into a revision of that proposal alone.)

**OBJECTION #23**

Section: 5 SPONSORING AUTHORITIES

**Current text:**

"Proposals for registrations may also come from other sources, e.g. firms or organizations. These must be referred for consideration to the Sponsoring Authorities as noted below."

**Problem and Action:**

"...as noted below" where?

**OBJECTION #24**

Section 5: Sponsoring Authorities

**Problem:**



There is only one Sponsoring Authority for a registration application.

**Action:**

Change "Sponsoring Authorities" to "Sponsoring Authority" in the title and throughout the text.

**OBJECTION #25**

Section: 5 SPONSORING AUTHORITIES

**Problem and Action:**

Why do Sponsoring Authorities have among their responsibilities ensuring that proposals comply with the IS rules (clause 6), and that POSIX locales and narrative cultural specifications do not contradict each other? Those are listed as Registration Authority responsibilities in Section 4. Why the duplication of effort and jobs? Who really owns these tasks?

**OBJECTION #26**

Section 5.1

**Action:**

Delete the 3rd paragraph of Section 5.1 ("Proposals for registrations ... as noted below.").

**Rationale:**

The 1st paragraph of this Section makes it very clear which bodies may submit an application. There is no need to list who may not.

**OBJECTION #27**

Section: 5 SPONSORING AUTHORITIES

**Problem:**

The proposed standard fails to specify the Sponsoring Authority's responsibility for corrections and updates.

**Action:**

Add to Section 5.2 as a new lettered item:  
to notify the RA about corrections and updates to existing registrations which were previously submitted by the Sponsoring Authority.

**EDITORIAL #28**

Section 5.1, 2<sup>nd</sup> paragraph

Delete this paragraph ("Sponsoring Authorities may submit ... their other Cultural Specifications.") because the topic is covered in Section 6.

**OBJECTION #29**

Section: 6 RULES FOR PROPOSALS

**Current text:**

"1. The Narrative Cultural Specification shall specify cultural conventions in narrative English, French and/or Russian, and may give equivalent

specifications in other languages."

**Problem and Action:**

According to Annex H, French and Russian are added in this version of the draft. Although many ISO standards are written in English and French, and so the addition of French is not surprising, the addition of Russian is. What is the rationale for doing so? As currently written, a specification could be written in Russian only and then added to the registry. Would any Registration Authority be likely to be able to review Russian-only text? If Russian is added, why not add, say, Spanish? Japanese? Chinese?

Russian should be removed from the list of languages here, unless there is a compelling reason it should remain. Of course, specifications could be submitted in English *and* Russian, or French *and* Russian under this rule, but Russian-only should not be allowed.

**OBJECTION #30**

Section: 6 RULES FOR PROPOSALS

**Current text:**

"Type 4 are for repertoire maps defined in this International Standard and in ISO/IEC TR 14652 (which are technical equivalent)."

**Problem and Action:**

The reference to 14652 is incorrect, but in what sense are the two documents cited technically equivalent? Repertoire maps are only mentioned in passing here; the syntax does not appear in this draft. Therefore, this text is incorrect and must be changed.

**EDITORIAL #31**

Section: 6 RULES FOR PROPOSALS

**Current text:**

"5. In case of a TR 14652 FDCC-set, or other machine-parsable cultural specification, it..."

**Problem and Action:**

Should be "machine-parsable". In addition, the reference to TR 14652 is incorrect.

**OBJECTION #32**

Section: 6.1

**Current text:**

". . . A Narrative Cultural Specification may alternatively be submitted on white paper of the approximate size 297 \* 210 mm, with margins of no less than 20 mm, or one of the approved document formats of ISO/IEC JTC 1, . . ."

**Problem and Action:**

What is the rationale for specifying the paper size here? Unless there is a good reason, this should be removed.

### **OBJECTION #33**

Section: 6.2 (and Annex G)

#### **Problem and Action:**

Section 6.2 contains a very terse list of items that could appear in a cultural specification. The description of these very terse items appears in the informative Annex G. This makes the document extremely difficult to use. When most readers see items like "Inflection" or "Coding of national entities" with \*NO\* further explanation, they will have no idea what is intended. They can go to Annex G, but why is the information there instead of where it is originally referenced?

The explanation of the items allowable in a cultural spec should appear in Clause 6 along with the items themselves. However,...

### **OBJECTION #34**

Section: 6.2

#### **Problem and Action:**

Some items currently listed as being allowable within a cultural specification should be removed. Among those are:

- \* Inflection -- There is no simple way to explain such a grammatically complex issue as inflection, and no reason this one aspect of grammar should be called out in a cultural specification.
- \* Coding of National Entities -- This is defined in Annex G as containing "coding for different entities...such as postal codes, administrative codes for local government, police districts, abbreviations for cities or provinces, and time zone names relating to different parts of the culture." This is so vague as to be useless, and in fact, the contents of this section in the Danish cultural specification in Annex D bears little relation to this description. That section includes, among other things, information about the longitude and latitude of Denmark, its area in kilometers, its population, the name of the Danish language in Danish, the name of the currency, and other facts. The section does include the fact that "postal codes are 4 digits", which does relate to the description of this item, but this information is too meager for any software engineer to actually use it. This section is too vague.
- \* Electronic Mail Addresses -- Such addresses are a function of the software that uses them; not of cultural requirements.
- \* Payment Account numbers -- These are application-specific, not cultural-specific.
- \* Man-machine dialogue -- The full description in Annex G for this item is "Considerations for how to localize products may be described here." Again, this is so vague that it is useless and should be removed.

NOTE: Further comments on the items currently allowed in a cultural specification will appear in Annex G comments, below.

### **OBJECTION #35**

Section: 6.4

#### **Current text:**

"The coded character set of ISO/IEC 646 International Reference Version

(ISO 2375 registration number 6) shall be used to represent text for the submitted files. For enhanced network portability it is recommended that only the invariant part of ISO/IEC 646 (ISO 2375 registration number 170), which contains 83 graphical characters (including space), is used.. ."

**Problem and Action:**

Remove the sentence, "For enhanced network portability..." POSIX.2 does not make this recommendation, and its portable character set includes nearly the entire repertoire of ISO/IEC 646 IRV. There is no need to be more restrictive in this document.

**OBJECTION #36**

Section: 6.8

**Problem and Action:**

The text defines token identifiers for various different entities, but does not explain the purpose of those identifiers. This information should be added.

**OBJECTION #37**

Section: 6.9

**Current text:**

". . .and optionally the long ISO/IEC 10646 character name. It is recommended to use, whenever possible, character names specified in ISO/IEC 9945-2:1993 Annex G."

**Problem and Action:**

Remove the sentence "It is recommended..." The character names mentioned here are from the Danish National Locale Example in POSIX.2. There is no reason these character names should be recommended. Rather, as noted previously in the text, the ISO/IEC 10646 names should be used and comments as needed added to help make the names more readable.

**OBJECTION #38**

Section 7: Appeal Procedures

**Problem:**

Sections 7.3 and 7.4 currently combine the instructions for two different types of appeal, making the Sections particularly difficult to interpret. An experienced standards-writer who is fluent in English commented "The two bullets in paragraph 7.3 duplicate ideas in 7.4" when, in fact, they do not.

**Action:**

Reorganize all of Section 7 using **Clause** 16 of CD 2375.2 as a model.

**OBJECTION #39**

Section 7: Appeal Procedures

**Problem:**

Invalid reasons for appeal are not specified.

**Action:**

Add a **clause** listing invalid reasons for appeal, e.g., if a proposed registration is rejected because it duplicates an existing registration.

#### **OBJECTION #40**

Section 7.3

**Problem:**

Section 7.3 specifies that appeals must be sent by registered mail to the RA. There is no other option.

**Action:**

Add fax and e-mail as permissible methods of delivery for appeals. (Both are permitted in CD 2375.2).

**Rationale:**

Omitting fax and e-mail and requiring exclusive use of postal delivery for appeals would make SC22/WG20 an object of ridicule worldwide.

#### **\*\*\* OBJECTION #41**

Section 7.4

**Problem:**

Sections 7.4 and 8.3 conflict.

(iv) Resolve the conflict between Section 7.4 and Section 8.3. Section 7 does not say when the RA-JAC-15897 is to consider appeals: is it before or after circulation of appeals to members of the JTC 1 subcommittee?

#### **\*\*\* OBJECTION #42**

Section 7.4

**Problem:**

The wording "according to its voting procedures" is unacceptably vague. In addition, it is not clear whose voting procedures are to be used: the Registration Authority's? or the procedures of the JTC1 subcommittee responsible for the maintaining [sic] of this International Standard?

**Action:**

Change "according to its voting procedures" to "according to the Directives for the technical work of ISO."

**Rationale:**

This is consistent with the wording of CD 2375.2.

#### **EDITORIAL #43**

Section 7.4

Change "maintaining" to "maintenance".

#### **OBJECTION #44**

Section 8 The Registration Authority's Joint Advisory Committee

**Problem:**

The advisory body created by this proposed standard has exactly the same name and abbreviation as the advisory body for ISO/IEC 2375. This will create confusion in the IT community.

**Action:**

The US recommends that the advisory body created by this proposed standard be called "Registration Authority's Joint Advisory Committee for ISO/IEC 15897" with the abbreviation (RA-JAC-15897).

**OBJECTION #45**

Section: Annex D, Clause 3, 4, 5, 6

**Problem and Action:**

All information shown in these clauses (Numeric formatting, Monetary formatting, Date and time conventions, Affirmative and negative responses, respectively) already is covered in ISO/IEC 9945-2 (POSIX.2). There is no reason to repeat it here. Remove these clauses.

**OBJECTION #46**

Section: Annex D, Clause 7 (National or cultural Information Technology terminology)

**Current text:**

"The official Information Technology terminology is "Edb-ordbog", DS 2049-1970, Gjellerup, København. A newer description can be found in Lars Frank: "edb-ordbogen", Kommunetryk, København 1984. "

**Problem and Action:**

Citing documents that were written 31 and 17 years ago as relevant for information technology is not useful. Technology and its terminology change so quickly that these documents must be out-of-date. Remove this clause.

**OBJECTION #47**

Section: Annex D, Clause 11 (Transformation of characters)

**Current text:**

"Transliteration of Cyrillic and Arabic is very different from English conventions.

For a fallback notation of some letters, refer to the following table:

	original letter	2-char	1-char
Æ	AE	E	
Ø	OE	Y	
Å	AA	O	
.	.	.	.

**Problem and Action:**

According to Annex G, this clause is for defining transliteration and transformations of characters ("...for example transliteration rules between Latin, Greek and Cyrillic, or fallback notation for some frequent letters...") Note that this cultural specification simply says that "Transliteration of

Cyrillic and Arabic is very different from English conventions" without giving any specific information about the differences, and without giving any information at all about how to do a transliteration. In other words, this provides no concrete information that a software engineer could use. The sentence "Transliteration of Cyrillic..." therefore must be removed.

The fallback information is a bit more useful, but does not provide any guidance about when such fallbacks are permitted. Can they be used any time the original letters are not available, or are there restrictions against their use in some circumstances? Are there requirements to keep an original copy of the data so that data is not lost?

More information is needed on fallbacks to make this clause useful.

#### **OBJECTION #48**

Section: Annex D, Clause 12 (Character properties)

##### **Current text:**

"The Greenlandic letter KRA < > has no uppercase equivalent, and is converted to a "Q" as also prescribed by modern Greenlandic orthography."

##### **Problem and Action:**

This is the first mention of Greenlandic KRA. If it should be considered part of Danish, it should be mentioned in Clause 1 (Alphanumeric deterministic ordering) and Clause 9 (Character set considerations). Either add it to the earlier clauses, or remove it here.

#### **OBJECTION #49**

Section: Annex D, Clause 13 (Use of special characters)

##### **Current text:**

"For quoting, the characters <"><">, <>><> and <"><"> are used, with the shown order."

##### **Problem and Action:**

This text is unclear. Does "with the order shown" mean that plain quotes are preferred, then guillemets, then fancy quotes? Or does it mean that when using plain quotes, use them in the order shown, and when using guillemets, use them in the order shown, etc.?

Revise the text to clarify the information about order.

#### **OBJECTION #50**

Section: Annex D, Clause 14 (Character rendition)

##### **Current text:**

"The Danish letters <Ø> and <ø> are often misprinted. The stroke in the letters is the problem. If you consider a rectangle box surrounding the letter, then the stroke should cross from the upper right corner to the opposite corner."

##### **Problem and Action:**

First, is this information still accurate, or was it accurate 7-10 years ago

when commercial fonts were not as readily available as they are today?

A more general problem is how this Clause might be used for other cultural specifications. If rendering issues with a single Danish letter are considered the appropriate information to put here, what might a Traditional Chinese cultural specification include, as it tried to explain all the nuances of rendering traditional Han ideographs? Or an Arabic specification that tried to explain how to render Arabic?

This section as described, and as this example shows, does not scale well beyond languages and cultures that have one or two specific rendering issues. This is inadequate and should be removed.

### **OBJECTION #51**

Section: Annex D, Clause 16 (Personal names rules)

#### **Current text:**

"Personal names are commonly spelt with the full first name, while use of initials only is seen also. People are mostly addressed by voice by their first name. The common address form is the informal "du", and the more formal "De" is becoming more common. The family name is never spelt in capital letters only,. . ."

#### **Problem and Action:**

This information is vague or useless. How would a software engineer use the information that "People are mostly addressed by voice by their first name" (which, by the way, should be their "given name", not their "first name")? The fact that "De" is "becoming more common" tells an engineer nothing concrete and so is useless. These sentences should be removed.

### **OBJECTION #52**

Section: Annex D, Clause 17 (Inflection)

#### **Current text:**

"The Danish grammar is defined in "Retskrivningsordbogen". Danish has more inflections than English, for example nouns will have 8 forms based on indefinite/definite, singularis/pluralis and nominative+others/genitive."

#### **Problem and Action:**

First, why does the information about Danish inflection compare it to English? Second, what would a software engineer be expected to do with these two sentences? Referring someone to a book about overall Danish grammar probably would have only the most limited value, but at least it points toward an agreed-upon standard. But why call out inflection separately, since it is only one part of grammatical rules?

This example simply illustrates why an earlier objection calls for removing this clause all together.

### **OBJECTION #53**

Section: Annex D, Clause 23 (Coding of national entities)

#### **Problem and Action:**



An earlier objection describes why this clause should be removed. The information here is such a random collection of factoids that it is useless.

#### **OBJECTION #54**

Section: Annex D, Clause 25 (Mail addresses)

##### **Current text:**

"...The postal code is placed before the city name. The CEPT country prefix should be places in front of the..."

##### **Problem and Action:**

Spell out CEPT somewhere so that non-Europeans have a chance of understanding what this means. Also, "...should be placed..." not "...should be places..."

#### **OBJECTION #55**

Section: Annex D, Clause 27 (Electronic mail addresses) and  
Clause 28 (Payment account numbers)

##### **Problem and Action:**

Remove these sections, as explained in an earlier OBJECTION. These are not cultural-specific.

#### **OBJECTION #56**

Section: Annex D, Clause 30 (Man-machine dialogue)

##### **Problem and Action:**

Remove this section, as explained in an earlier OBJECTION. This is too vague to be useful.

#### **OBJECTION #57**

Section: Annex E ("reorder-after" construct in POSIX LC\_COLLATE)

##### **Problem and Action:**

The reorder-after and reorder-end keywords are described in ISO/IEC 14651, and should not be repeated here. This annex should be removed, or rewritten simply to point to ISO/IEC 14651.

#### **OBJECTION #58**

Section: E.3 (Example of "reorder-after")

##### **Current text:**

```
". . .
<O/>      <O/>;<NONE>;<CAPITAL>
<o/>      <O/>;<NONE>;<SMALL>
<AA>      <AA>;<NONE>;<CAPITAL>
<aa>      <AA>;<NONE>;<SMALL>
reorder-end
```

```
". . .
2.      The second "reorder-after" statement. . .initiates a second list,
rearranging the order and weights for the <AE>, <ae>, <A:>, <a:>, <O/>, and
<o/> collating elements after the <z8> collating symbol in the copied
```

specification.

. . .

4. Thus for the original sequence

...

this example reordering gives

... Uu Vv Ww Xx ( Yy Üü ) Zz ( Ææ Ää ) Øø Åå

5. . . .

the example reordering in E.3.1 gives

... ( Uu Ûü Úú ) Vv Ww Xx ( Yy Ýý Üü ) ( Zz Zz )

( Ææ ´Æ´æ ¯Æ¯æ Ää ) ( Øø ´Ø´ø Öö ) ( Åå ( AA Aa aA aa ) ´Å´å )"

#### **Problem and Action:**

So much text is quoted because it is completely inconsistent. The example syntax shows <AA> and <aa>, but not Å and å (<A-ring> and <a-ring>). The explanation in item #2 includes neither the <AA>/<aa> pair, nor <A-ring>/<a-ring>. The reordering in item #4 shows <A-ring>/<a-ring>, but not <AA>/<aa>. The reordering in item #5 shows <AA>/<aa> and <A-ring>/<a-ring>.

Much of this text is wrong, but it's not clear what the author intended, so no alternative text is suggested here. Fix the text to be consistent and correct.

#### **OBJECTION #59**

Section: Annex F (Information on "reorder-after" construct in LC\_COLLATE)

#### **Problem and Action:**

As with Annex E, the reorder-after keyword is described in ISO/IEC 14651, so information about it is not necessary in this document. This annex should be removed.

#### **OBJECTION #60**

Section: F.3 (Sample POSIX Locale Specification for Danish and Irish Gaelic)

#### **Problem and Action:**

Having these locale specifications in an annex that is supposed to describe the rationale for the "reorder-after" construct makes no sense. These should be in a separate annex.

#### **OBJECTION #61**

Section: Annex G

#### **Problem and Action:**

As noted previously, the information in this annex should be included in Clause 6 in the main section of this document. It is confusing and inconvenient to have one-line items in the normative section, and then force users to search elsewhere to determine what those one-line items mean.

#### **OBJECTION #62**

Section: Annex G; 1st paragraph

**Current text:**

". . . Clauses 1 to 6 are related to POSIX and the narrative description should be accompanied by a corresponding POSIX Locale specification. . ."

**Problem and Action:**

Nothing in the normative section of this document states that a narrative description \*and\* corresponding POSIX locale specification should be submitted together. Sections 4 and 5 say that such documents, if they exist, must not be contradictory (see earlier objection about the vagueness of that requirement), but do not imply, as this text does, that both a narrative and a locale spec should be submitted together.

Change the sentence to "Clauses 1 through 6 are related to POSIX."

**OBJECTION #63**

Section: Annex G, Clause 1 (Alphanumeric deterministic ordering)

**Current text:**

". . . Issues to cover are: are there any letters that are sorted differently from other languages, are capital letters sorted before small letters, are there a specific ordering of accents? . . ."

**Problem and Action:**

The world contains more than the Latin script, but nearly all examples and explanation in this document (like this text) focus on European needs and requirements of the Latin script. What about how Han ideographs are sorted in relation to local phonetic scripts? What about Arabic presentation forms? What about sorting of vowels and consonants? How about sorting requirements that may not be expressible with the limited POSIX syntax? Should such requirements be listed here, or in Clause 10?

The text should take into consideration the needs of non-Latin scripts.

**OBJECTION #64**

Section: Annex G, Clause 3 (Numeric formatting)

**Current text:**

"Here it is described how numbers are input and formatted,. . ."

**Problem and Action:**

Neither of the examples in Annex D give any information about how numbers are input. What does this mean?

**EDITORIAL #65**

Section: Annex G, Clause 4 (Monetary formatting)

**Current text:**

"Here numeric formatting for monetary amounts is described as well as the currency denominators, both locally and according to ISO 4217, are specified, and the relation between the amount, a sign and the currency denominator is specified."

**Problem and Action:**

Grammatically ambiguous, and an odd term (currency denominator) for what

POSIX.2 calls the "currency symbol". Rewrite this as: "Here formatting rules for monetary amounts, as well as local and international currency symbols, are described."

#### **OBJECTION #66**

Section: Annex G, Clause 8 (National or cultural profiles of standards)

**Current text:**

"Here profiles of standards can be listed, for example, OSI national profiles, or profiles of the POSIX standards. See the POSIX ISO/IEC 9945-2 standard for an example."

**Problem and Action:**

Is there any country other than Denmark to whom this Clause applies? Denmark has gotten locales published in POSIX, but others have not.

If this only applies to Denmark, remove this clause.

#### **OBJECTION #67**

Section: Annex G, Clause 11 (Transformation of characters)

**Current text:**

"Here transliterations and transformations of characters can be described, for example transliteration rules between Latin, Greek and Cyrillic, or fallback notation for some frequent letters. Also this is the place to write about standards in the culture for character conversion."

**Problem and Action:**

This is too vague to be useful, as the Danish example in Annex D illustrates. Remove this clause.

#### **OBJECTION #68**

Section: Annex G, Clause 16 (Personal names rules)

**Current text:**

"Personal naming differs from culture to culture. . . Also the rules for children inheriting their fathers' and mothers' family name, and what happens for married couples may be described here."

**Problem and Action:**

While this may be interesting information, of what use is it to software developers? For most countries, there are general conventions about family names, but so many individual exceptions that the conventions cannot be hard-coded into software. What is the justification for including this information?

#### **OBJECTION #69**

Section: Annex G, Clause 22 (Date and time)

**Current text:**

"This is for considerations in excess of clause 5, such as non-POSIX date conventions, time zone names and daylight savings rules, . . ."

**Problem and Action:**

Time zone names and daylight savings rules should not be in a cultural narrative. Especially for large countries, there are too many zones and local exceptions for this information to be useful. Time zones are geographical and political rather than cultural.

Remove this clause.

**OBJECTION #70**

Section: Annex G, Clause 23 (Coding of national entities)

**Problem and Action:**

As noted in a previous objection, this information is too vague to be useful. Remove this clause.

**OBJECTION #71**

Section: Annex G, Clause 27 (Electronic mail addresses) and  
Clause 28 (Payment account numbers)

**Problem and Action:**

As noted in a previous objection, these clauses are usually application-specific, rather than culture-specific. Remove these clauses.

**OBJECTION #72**

Section: Annex G, Clause 30 (Man-machine dialogue)

**Problem and Action:**

As noted in a previous objection, this information is too vague to be useful. Remove this clause.

**OBJECTION #73**

Section: Annex H

**Current text:**

"6. French and Russian were added as languages for narrative cultural specifications."

**Problem and Action:**

As noted in a previous objection, remove Russian as a language for narrative cultural specifications. Note, however, that it would be fine to submit a specification in Russian and English or Russian and French.

**OBJECTION #74**

Section: Annex H, Bibliography

**Current text:**

"2. ISO/IEC TR 14652:2001 Information technology - Specification method for cultural conventions."

**Problem and Action:**

This document was not approved as a TR, so the reference here is incorrect.  
Remove it.

End of document