

Title: US Comments on the Development of the ISO/IEC 15897 Cultural Registry. Part 1: General Concerns

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Having examined the database at <http://std.dkuug.dk/cultreg/>, the US is gravely concerned about the integrity and reliability of the cultural registry to be established under the provisions of ISO/IEC 15897. The integrity and reliability of the ISO/IEC 15897 cultural registry is essential if:

- The computer industry is to use it as a source for cultural information when localizing products;
- Purchasing agencies are to reference it in procurement documents in the sure knowledge that information from the registry will not be challenged.

These are mandatory requirements for the ISO/IEC 15897 cultural registry:

- 1) The cultural registry for ISO/IEC 15897 must be completely separate.
- 2) The ISO/IEC 15897 cultural registry must start with a “blank slate,” i.e., with no documents in it.
- 3) All registrations entered in the ISO/IEC 15897 cultural registry must have been developed according to the provisions of the ISO/IEC 15897 standard. No other procedure may be substituted, no matter how similar.
- 4) An application for registration shall not be added to the ISO/IEC 15897 cultural registry until:
 - a) it has been circulated to members of SC22 for comment; and,
 - b) all the comments have been accommodated to the satisfaction of each member that made the comment.

The database at <http://std.dkuug.dk/cultreg/> does not meet these requirements. This database amalgamates the cultural registries of CEN ENV 12005 and ISO/IEC 15897. “This is the web site for the ISO/IEC 15897 and CEN ENV 12005 cultural registry.”

The amalgamation is based on the assertion: “ISO/IEC 15897 and CEN ENV 12005 are technically equivalent.” This is a false statement. The present version of ISO/IEC 15897 includes a section that does not exist in CEN ENV 12005, namely, the debatable issues.

The US is gravely concerned at the unilateral action of the ISO/IEC 15897 registrar who amalgamated the ISO/IEC 15897 registry with the CEN ENV 12005 registry.

We are concerned on three grounds:

- Although ISO/IEC 15897 and CEN ENV 12005 are similar, they are different standards controlled by different organizations. The administrative difference between them, and so the need for separate registries, should have been as apparent to the ISO/IEC 15897 registrar as it is to the US.

- There is no provision for the amalgamation of the ISO/IEC 15897 registry with any other registry in ISO/IEC 15897. The first duty of the registrar is to adhere to the provisions of ISO/IEC 15897 and not to take unsanctioned actions affecting the registry.
- The ISO/IEC 15897 registrar failed to consult the members of ISO/IEC JTC1/SC22 about the amalgamation. (We do not know whether CEN TC 304 was consulted about the amalgamation.)

The US directs the attention of SC22 members to the International Registry of Coded Character Sets (<http://www.itscj.ipsj.or.jp/ISO-IR/>), established under the provisions of ISO/IEC 2375, which is a sterling example of how data in a registry should be maintained and presented.