

ISO/IEC JTC 1/SC 2
Coded character sets
Secretariat: JISC (Japan)

Document type: Liaison Organization Contribution

Title: Unicode Consortium Comments on SC 2 N 4418 and N 4415

Status: This document is circulate for consideration at the SC 2 plenary meeting, Matsue, Japan, 2015-10-19, 23.

Date of document: 2015-10-04

Source: Unicode Consortium

Expected action: ACT

Action due date: 2015-10-19

No. of pages: 6

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Committee URL: <http://isotc.iso.org/livelink/livelink/open/jtc1sc2>

Doc Type:	Liaison Contribution
Title:	Comments on SC2 N4418 and N4415
Status:	Circulated for information
Source:	Unicode Consortium
Action:	For consideration by JTC1/SC
Date:	October 1, 2015

In SC2 document [N4418](#), the Japan national body has requested discussion of [N4415](#), a contribution from IRG, be added to the agenda of the SC2 plenary meeting in Matsue later this month. It is not clear what actions or outcomes Japan may be seeking from discussion in SC2. However, as N4415 is discussing SC2 process in relation to Amendment 2 of ISO/IEC 10646:2014, and noting that Japan had previously submitted documents [N4396](#) and [N4397](#) stating a position on SC2 process in relation to Amendment 2, it is apparent that a discussion of SC2 process is desired.

This contribution provides some observations regarding ISO/IEC procedures as they bear on SC2 process generally, and on process for Amendment 2 specifically. The intent is to provide context that will hopefully help in discussion during the SC2 plenary.

Chronological Background

At the Colombo meetings in October 2014, IRG gave a report to WG2 on work on CJK Extension F (“CJKF”), and WG2 agreed on a recommendation that the CJKF repertoire be added to ISO/IEC 10646:2014 PDAM 2.2. The SC2 plenary took a resolution ([N4377/M19-06](#)) approving circulation of a PDAM2.2 ballot; no action pertaining specifically to CJKF was taken, however. PDAM2.2 ([N4379](#)) was circulated for SC2 ballot later that month.

The summary of voting on the PDAM2.2 ballot ([N4387](#)) was circulated to SC2 members in January 2015. The results included technical comments related to CJKF from China, Japan, UK and US, with Japan, UK and US voting “No”. Technical comments reflected several significant issues in relation to the CJKF repertoire:

- Japan made a general comment about the chart as a whole being incorrect.
- US requested that 49 “USAT” characters be removed.
- China requested that 49 “USAT” characters be removed, and also that 11 additional characters be removed.
- UK requested removal of 48 “USAT” characters, but disagreed with removal of the 49th. UK also mentions 11 additional characters as potentially needing to be removed (as requested by China), voicing uncertainty as to whether the CJKF repertoire is sufficiently mature for progression to JTC1 (enquiry draft) balloting. UK also requested re-assignment of code positions for new unified ideographs, with significant impact on the CJKF block.

The disposition of PDAM2.2 comments ([N4388](#)) was circulated on February 3, 2015. Given the numerous comments on CJKF, the decision of the project editor and secretariat as to how to proceed with the project was to issue another PDAM ballot for Amendment 2 with CJKF removed, with the intent of moving the CJKF repertoire to the CD for the next edition. Work on the next edition was also in progress at the time.

PDAM2.3 ([N4389](#)) was circulated for SC2 ballot February 3, 2015.

On March 11, 2015, Japan submitted documents [N4396](#) and [N4397](#) for SC2 consideration. In N4396, Japan voices disagreement with the decision to circulate PDAM2.3 with the CJKF repertoire removed. The following excerpts are taken from their explanation of the reasons for objection:

“Japan NB considers the disposition of comments and the revised PDAM have been prepared based on the several inappropriate comments on PDAM 2.2 for CJK F.

“IRG has taken a lot of effort to develop CJK F over several years, and had concluded that CJK F has been well verified enough to propose WG2 for inclusion in ISO/IEC 10646. Then at the last WG2 meeting in Colombo, WG2 recommended the proposed CJK F for inclusion in Amendment 2 with unanimous consensus.

“According to the disposition of comments, CJK F was dropped mainly due to the comments from UK National Body without any effort to clarify to IRG.”

In N4397, Japan gives a more detailed response to the UK ballot comments.

IRG submitted document [N4415](#) in September 2015 for consideration by the SC2 chair. This document presents an IRG opinion regarding the processing of PDAM2.2:

“Most of the [PDAM2.2 comments regarding CJKF] are not appropriate because they had been discussed at previous IRG meetings and IRG experts already made the consensus on them. Thus these comments should not have been the basis for the removal for the whole set of CJKF from PDAM2.2. Only one comment has resulted in minor correction which should also not be basis for the removal of the whole set.”

The IRG document goes on to voice concern with CJKF being delayed by six months. It also gives recommendations on how expert comments regarding CJK additions can be handled entirely within the IRG context.

Comments regarding processing of PDAM2.2

In an April 9 addendum attached to N4396, Japan cites clause 2.5.3 of the ISO/IEC Directives, Part 1, noting that their disagreement with the decision to issue PDAM2.3 had been submitted to on March 11. This was an important, procedural observation since clause 2.5.3 requires that any objection to a decision on how to progress after a PDAM ballot must be voiced within 2 months. (The document was not added to the SC2 register until April 13.)

The full context of clause 2.5.3 is helpful to consider. The options for how to progress after a PDAM ballot that are allowed for are the following:

- a) Discuss the committee draft and comments at the next committee / subcommittee meeting.
- b) Circulate a revised committee draft for consideration.
- c) Register the committee draft for the enquiry stage (that is, progress a PDAM to DAM status).

In this instance, the decision taken was option (b) with the revisions including the removal of CJKF. The available alternatives would have been options (a) or (c), or circulation of a revised committee draft (PDAM2.3) with some revisions but with CJKF still included. Let us consider each of these.

First, consider option (a). Had that option been adopted, it would have postponed any further progress on Amendment 2 until after the next SC2 meeting — that is, until after the October meeting in Matsue. This would have delayed all progress on Amendment 2 by nine months. As N4415 voices concern over a six-month delay, it seems evident that an even longer delay would have raised even greater concerns.

Secondly, consider the variation of option (b), which would have been to circulate PDAM2.3 with CJKF still included. The project editor would need to have decided how to respond to UK comments: if these were accommodated, then based on comments in N4397 and N4415, the likely outcome of the PDAM2.3 ballot would have included objecting comments from Japan or other member bodies. But if the UK comments had not been accommodated, then there was a possibility of sustained objection from UK and perhaps other member bodies, though perhaps through additional interaction that may be been avoidable. But in any event, having CJKF in another round of committee draft balloting would have resulted in a six-month delay which, as noted above, has been a cause of concern.

Finally, consider option (c). Given the extensive ballot comments, this option would have entailed a real possibility that other national bodies might raise objections on that decision. To avoid that, it would have been necessary for the project editor and secretariat to be confident that revisions could be made that would satisfy all concerned parties. Yet because of the extensive ballot comments from national bodies, it is unclear how they could have accomplished this apart from a face-to-face meeting — which would have been option (a), already discussed above.

The decision to advance to enquiry stage is a very significant decision and requires careful consideration. Clause 2.5.6 of the Directives discusses this in greater detail (excerpts quoted, with emphasis added):

2.5.6 The decision to circulate an enquiry draft (see 2.6.1) shall be taken on the basis of the consensus principle.

It is the responsibility of the chair of the technical committee or subcommittee, in consultation with the secretary of his committee and, if necessary, the project leader, to judge whether there is sufficient support bearing in mind the definition of consensus given in ISO/IEC Guide 2:2004.

“consensus: General agreement, characterized by the absence of sustained opposition to substantial issues by any important part of the concerned interests and by a process that involves seeking to take into account the views of all parties concerned and to reconcile any conflicting arguments.”

... The concept of sustained opposition is not applicable in the context of member body votes on CD, DIS or FDIS since those are subject to the applicable voting rules...

Within ISO and JTC 1, in case of doubt concerning consensus, approval by a two-thirds majority of the P-members of the technical committee or subcommittee voting may be deemed sufficient for the committee draft to be accepted for registration as an enquiry draft; *however every attempt shall be made to resolve negative votes.*

Abstentions are excluded when the votes are counted, as well as negative votes not accompanied by technical reasons.

These procedures direct the project leadership to evaluate consensus for enquiry registration, with approval of a two-thirds majority of P-members being sufficient indication. The PDAM2.2 ballot had 11 approvals out of 17 qualifying votes, which is just short (65%) of a two-thirds majority (67%). In addition, the project leadership is directed to make “every attempt... to resolve negative votes”. It seems clear that this would not have been the case had a decision been made to progress Amendment 2 to enquiry stage.

In considering the options available to the secretariat and project editor, then, there was no option available to avoid a delay of six months or longer for some or all of the new repertoire included in PDAM2.2. The decision taken entailed a delay of CJKF by six months while allowing other repertoire additions to progress without delay.

Having given full consideration to all of the facts, then, it is the opinion of the Unicode Consortium that the project leadership chose the best option possible, with a six-month delay to CJKF while avoiding any delay to other parts of PDAM2.2 that were not under contention.

Procedural comments regarding the disagreement on the PDAM2.2 outcome expressed by Japan and IRG

Regardless of how the decision taken following the PDAM2.2 ballot may be evaluated by others, it is the right of any P-member bodies to voice disagreement with that decision. As noted earlier, this is stated in Clause 2.5.3 of the Directives. Here is the relevant text from Clause 2.5.3:

“If, within 2 months from the date of dispatch, 2 or more P-members disagree with proposal b) or c) of the secretariat, the committee draft shall be discussed at a meeting.”

Japan’s disagreement was first voiced on March 11, well within two months of circulation of the disposition of comments for PDAM2.2 and of PDAM2.3 (both on February 3). However, no other P-members expressed disagreement with that decision. Concern was voiced by IRG in N4415, but IRG is not an ISO member body, hence does not qualify in satisfying the criteria stated in Clause 2.5.3.

Therefore, it does not appear that there would be any formal, procedural grounds to revisit the decision taken to circulate PDAM 2.3.

Moreover, had there been other P-members similarly voicing disagreement, the result would have been to revert to option (a), discussion of the draft at the next SC2 meeting, resulting in a delay of at least nine months. As discussed above, it does not appear that this would have been a more satisfying course of events for concerned parties than what has, in fact, come to pass.

General comments regarding process in relation to CJK

It appears that the primary concern for Japan and for IRG is the delay that has occurred in finalization of CJKF. As explained above in detail, it appears that a delay of six months or even longer could not have been in any way avoided given the results of the PDAM2.2 ballot.

IRG suggests in N4415 that such delays can be avoided by having concerned experts participating in the work of IRG to prepare new CJK repertoires that have been carefully reviewed and evaluated as candidates for encoding. The Unicode Consortium agrees: IRG has had a key role in preparing CJK repertoires for encoding for many years, and there is no question that their work has expedited development of the ISO/IEC 10646 and Unicode standards as a result.

Moreover, Unicode firmly believes that a product is developed most quickly and with the highest quality when attention to quality is driven as early in development as possible. If some national bodies had particular concerns about technical quality in CJKF, then participation of experts nominated by those national bodies earlier in process very likely would have resulted in consensus earlier on. And participation in the work of IRG is an excellent way for such experts to contribute to driving quality earlier into the development process.

It must be kept in mind, however, that there can never be any guarantee that all expert input on CJK matters will come in via engagement with IRG or that delays arising from committee or enquiry draft ballot comments will never occur. IRG is an informal working group of experts; strictly speaking, it exists outside of formal JTC 1 process, providing carefully-prepared expert input into SC2/WG2. Any consensus of experts within IRG — or, for that matter, consensus of experts within WG2 — has no binding impacts whatsoever on national bodies in committee draft ballots within SC2, or in enquiry draft ballots within JTC 1. No matter how much preparatory work is done within IRG, there will always be a possibility of comments resulting in delay that come from a national body during ballot comments.

In summary, then, the Unicode Consortium agrees with the encouragement given in N4415 for CJK experts to engage actively in the work of IRG to drive in quality early. But we also think it important to keep in mind that process may not always go as smoothly as we'd like when numerous national bodies acting independently are involved. Looking back, we believe the informal processes involving IRG have historically had great success. We encourage others, then, to take encouragement from those successes, and not be discouraged or alarmed by an occasional and relatively-minor delay such as has occurred in the case of CJKF.