

JT/01-0090

February 14, 2001

Subject: Proposed US National Body Contribution Detailing Objections to SC 35 NPs Contained in JTC 1 N 6359 and JTC 1 N 6360

From: Arnold Winkler, Unisys and NCITS/L2 Chairman

At the January 2001 meeting of the JTC 1 TAG, the following action item was assigned:

18. Mr. Winkler, with input from other members of the JTC 1 TAG community, will draft a document to be balloted as the US contribution detailing objections to JTC 1 N 6359. The JTC 1 TAG ballot will close on March 12, 2001. (Agenda Item 8.5, January 2001 minutes)

The proposed US National Body contribution detailing objections to the SC 35 NPs contained in JTC 1 N 6359 and JTC 1 N 6360 has been reviewed by NCITS/L2. NCITS/L2 recommends that the US reject the SC 35 NPs contained in JTC 1 N 6359 and JTC 1 N 6360.

**US comments to SC 35 New Project proposals
in JTC 1 N 6359 – N 6361**

(SC 35 N 0200, N 0202, N 0215, and N 0216)

Developed by NCITS/L2 on January 29, 2001

The following documents have been distributed in SC 35 and JTC 1. In the United States we have no Technical Advisory Group (TAG) for SC 35. The subject matter is of interest to NCITS/L2, the TAG to character sets and internationalization in SC 2 and SC 22/WG 20 which are part of the Technical Direction for Cultural and Linguistic Adaptability and User Interfaces (CLAUI).

NCITS/L2 has reviewed the documents and recommends that the US reject the NPs in JTC 1 N 6359 and in JTC 1 N 6360 for the reasons outlined below:

JTC 1 N 6359

This is a proposal for a new project on test methods for assessing cultural and linguistic adaptability in hardware and software. This could clearly become a certification tool for all products, both hardware and software. I quote "This international standard will assist in the clarification of marketplace rules for everybody and bring an objective assessment method to measure cultural and linguistic adaptability. It is also a tool for comparing competing products and hence will help in making buying choices."

General remark:

This NP has several problems. We believe the proposal is "backwards" in many ways.

- The proposal is for test methods, but should not a standard and conformance specifications come first? Then test methods second?
- We believe, the proposal answers questions incorrectly.

Detailed comments:

Purpose and justification

This section of the NP contains the term "**marketplace rules**". It is not clear what is meant by "marketplace rules". From this context, it could be understood to mean regulations pertaining to commerce within a particular country (or between countries), or rules driven by the market (economy), or yet another definition. This statement is too vague.

Another part of the text postulates: "**It is expected...typically no product will be assigned a null mark**". This cannot be determined by the amount of information in the proposal. Since it is not clear which criteria are used to judge product, it seems to be pure speculation how products would be judged.

There seems to be a tension in this proposal between regulating "cultural and linguistic adaptability" and letting the market decide how appropriate a product is for a particular culture, language or region. Case in point: "...so that cultural and linguistic adaptability conformance will be progressively defined...by the market and hence will constitute a moving --and evolving--target by nature". In other words, the standard would theoretically shift over time to incorporate those needs determined by the market. However, it should be pointed out here that products also change with market demand; if a product does not meet market demand, it does not sell well. Why then is a standard even necessary when it appears it would be following or paralleling product rather than helping to shape the product?

A.1 Market Requirement - An international standard is essential to diminish bad surprises in global software trade.

Comment: What are "bad surprises in global trade?" - we have no sense of market needs from this statement.

A.2 Regulatory Context - Many jurisdictions already have legal and regulatory requirements about cultural and linguistic adaptability (e.g. South Africa, Spain, Switzerland, Canada, Québec, France, European Community, NAFTA, etc.).

Comment: Would this voluntary standard be turned into a regulation (involuntary standard), either as the basis for suppliers declaration of conformity or in certification schemes?

C.1 The NP states that this is **mature technology** ...

Comment: We are challenging that assertion. Which mature technology is being standardized?

B.3 The NP references **other standards** but does not list them.

D.1 Conformity Assessment – "Indicate here if Conformity Assessment is relevant to your project. If so, indicate how it is addressed in your project plan."

NO is checked and the following statement is made: "The standard will be a method used to evaluate products and services from a cultural and linguistic adaptability perspective. Conformity will be with the method, not with the evaluation resulting from the use of the method"

Comment #1: This is a loaded term. "Cultural and linguistic adaptability" are terms that can shift quickly, depending on a culture's current language policy (either de facto or de jure); this standard does not address that issue whatsoever.

Comment #2: Test methods are an integral part of a conformity assessment system. The answer "no" on this question is incorrect and possibly misleading. We wonder, whether there are plans to set up a certification and accreditation infrastructure or will suppliers declaration of conformity be acceptable and why?

General comment: Regulations are usually for health, safety, and environment concerns – not for "bad surprises" - so the above questions are of real significance.

In conclusion, the proposal is vaguely worded, unclear with regards to its role in shaping future IT products, and does not take the immense political complexity of linguistic and cultural concerns fully into account.

These comments above are in parts also valid for the other NPs below.

JTC 1 N 6360

This is a proposal for guidelines for drafting standards with respect to cultural and linguistic adaptability.

Essentially the same comments as for JTC 1 N 6359 above apply to that NP.

JTC 1 N 6361

This is a "Report on short meeting on possible new projects for elderly and disabled people". It does not, as the title leads one to believe, advocate the employment of these people in SC 35 projects :) Rather it addresses such things as "proposing an NP on specifying the requirements on symbols and icons for elderly and disabled persons" and "test methods for these symbols and icons"

SC 35 N 0216

The resolutions from the plenary. Note the creation of WG 5 on "Cultural, Linguistic and User Requirements" and the decision to move the "Japanese proposal on five graphical symbols for use on I.T. equipment" forward for fast track approval.