

Response to MA Position Statements, and Additional Comments on Proposed Draft ToR (N15)

To: ISO/IEC JTC 1/SC 2/AHG 1

From: Peter Constable, Robin Leroy

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0. Introduction

AHG 1 members were invited to submit position papers regarding the proposal to establish an MA, with particular consideration of AHG 1/N 15. As authors of the proposed drafts for MA Terms of Reference in N10 and N15, we have opted to wait for other AHG 1 members to submit position papers so that we could respond to open issues raised, in addition to providing our own suggestions or issues for consideration.

In the following sections, we will provide our perspective on issues raised in contributions submitted by AHG 1 members from China (N16), India (N17), Japan (N18) and Canada (N19). Some of the issues raised in these documents overlap, in which case we will consolidate our comments.

In a later section, we will provide additional comments on N15 with proposed changes.

First, we begin with some general comments on the MA proposal and progression of the task assigned to AHG 1.

1. General comments

1.1 “Bicameral” model of N15

From our prior contributions, it is to be understood that we support the proposal to establish an MA for UCS repertoire maintenance as we believe this will benefit long-term feasibility for on-going maintenance of the UCS repertoire.

N10 was prepared with the intent of helping AHG 1 in its process by providing a “strawman” model for a possible MA that AHG 1 members could respond to. That proposed draft Terms of Reference (“ToR”) was modelled after the ISO 639 MA ToR, which one of the current authors is closely familiar with. In the ISO 639 context, the owning ISO committees—TC 37/SC 2 and TC 46/SC 4—were comfortable entrusting the maintenance work to a small group of experts appointed by each committee as a whole (or by Category A liaisons), rather than appointments from individual P-member bodies. That model still involves

participation in proposals and input from many parties, but entrusts the final decisions to that small group. It was thought that *could* be a viable model for a UCS MA, but that wasn't assumed to be the *only* model that could be entertained.

In the discussion at Niigata and subsequent contributions, it is evident that a different model is more likely to gain approval from SC 2: one like that in N15 in which SC 2 P-members can make appointments to an MA decision-making group. This is another model that also has precedents in other ISO MAs, and is one we are comfortable with.

1.2 Progressing toward implementation

If there is general consensus within AHG 1 to work towards a recommendation for SC 2 action to establish an MA, then we will need to provide SC 2 with the following:

- A proposed draft ToR for the MA
- A proposed plan for how SC 2 gets the MA established.

At this point, it appears that the proposed draft ToR in N15 provides a workable basis for a *draft* ToR that can be further developed into a ToR that could be approved by SC 2. Therefore, we recommend that AHG 1 adopt N15 as an initial working draft and focus on what changes to that draft are needed to provide a document that can be proposed for SC2 action.

Regarding an SC 2 plan for how the MA gets established, we suggest the following:

1. SC 2 has work in progress on the 7th edition. For SC 2 to establish an MA, an 8th edition should be developed that states the stable content of ISO/IEC 10646—the encoding architecture, conformance, etc.—and that asserts the existence of the ISO/IEC 10646/MA for future maintenance of the UCS repertoire operating an approved ToR.
2. SC 2 will need to plan for a ToR document to be approved concurrent with or very soon after approval of the 8th edition.

(Note: the ToR will not need to go through the same enquiry / approval stages that are used for an IS. In the case of the ISO 639/MA ToR, that was approved by TC 37/SC 2 and TC 46/SC 4 by mail ballot shortly after ISO 639 was approved.)

3. SC 2 will need a transition plan for the period between when work on an 8th edition begins and the point after approval of the 8th edition and an MA ToR when the MA operation begins. During this period, to minimize disruption of work on new additions to the UCS repertoire, an amendment to the 7th edition can be developed at the same time the 8th edition is being developed.

Since the process for establishing an MA and approving a ToR is less familiar, we also recommend that we request assistance from the Technical Program Manager for SC 2 in ISO CS during this process.

2. Response to position statements

The following are our responses to comments and issues raised in the various position statements. We don't respond on every point. In general, we invite AHG 1 participants to suggest specific changes to N15 that could improve the working draft ToR.

2.1 General / common

2.1.1 *Comparison with WG 2*

From some comments, we sense that people could be considering an MA make-up and process in comparison with WG 2 and SC 2. It's important to make sure only appropriate comparisons are made. In particular, we worry that there may be some misunderstanding of the role and authority of WG 2. As stated in [clause 1.12.1 of the ISO/IEC Directives, Part I](#), working groups are not empowered to make formal decisions on a standard, but rather are experts acting in a *personal* and *purely international capacity* to give *recommendations* to its parent committee. In current work on UCS, WG 2 provides *recommendations*, but *decisions* regarding UCS lie solely with SC 2.

In the proposed MA structure and process, comparison could be made to both WG 2 and SC 2, but at different stages of the process. Prior to the formal decision process, there is a commenting phase, and the MA participants could decide to engage with one another or with other experts to discuss a proposal and comments received. In this portion of the MA process, comparison to WG 2 is reasonable. When formal decisions are being taken, however, WG 2 is not an appropriate comparison. At this phase, SC 2 via an approved ToR is delegating decision making power to just those parties identified in the ToR as participating in decisions (cf. clause 5.4 of N15).

So, for example, while the MA could decide to convene a meeting that includes external, invited experts to discuss some proposal—which is similar to how WG 2 has long operated—, such meetings would not be ones in which formal decisions are made, and external experts would not be participants in decisions—which is comparable to how SC 2 operates.

2.1.2 *Unicode representation and voting weight*

Both China and India raised questions about the level of representation or *voting weight* that Unicode would have under the terms drafted in N15. We wish to clarify this.

The model in N15 for the *decision-making process* is a “bicameral” model, in which formal decisions involve two groups that both need to agree for a proposal to be approved. The model reflected in point 4 of N15, clause 5.4.1 is that these two groups are:

- Unicode (“the IA”), and
- The voting group representatives appointed by SC2 P-members

This was intended to reflect the de facto practice in the synchronized maintenance of ISO/IEC 10646 and the Unicode Standard since the beginning of these standards, as was mutually agreed circa 1990. We think this continues to be an appropriate model that balances the concerns of national standards bodies on the one hand and, on the other, the broad technology industry as well as many other SDOs that rely on detailed implementation specifications provided by Unicode.

In this model, the IA has decision making authority equal to the P-member representatives, not higher: agreement from both groups are needed for a proposal to be approved.

India commented that the maximum number of IA representatives is not clearly defined. For purposes of *formal decision making*, Unicode effectively has only one voice in decisions, so the question isn’t relevant. At the same time, we do anticipate that MA voting members (and potentially observers) will meet to deliberate on pending decisions, and in *that* context the question could be relevant.

That distinction between phases of the process is important. If we compare to Unicode representation in WG 2 today, per the ISO/IEC Directives, Unicode as an SC 2 category A liaison is not constrained in how many of its representatives can participate in WG 2; but (as discussed above) WG 2 is not a decision-making body. If the ToR were directly parallel to that, it might not put a maximum limit on the number of IA participants *during commenting and discussion*. But as drafted in N15, the IA has one voice. However, having said that, we would not be opposed to limiting the number of IA representatives in attendance at any Voting Group meeting in which *closed MA discussions* on proposals take place.

2.1.3 Intellectual property rights

Both China and Japan raised questions regarding IP rights. There are two aspects to IP rights to be considered:

- IP rights related to *contributions*, including proposal documents and fonts.
- Copyright and licensing of content *published* by the IA.

Before commenting further, we would caution that AHG 1 and SC 2 should not step outside its appropriate scope: the IP policies of ISO and IEC are the purview of their respective legal departments, not SC 2 or AHG 1. Having said that, there are things we can point out based on the published IP statements of the parent organizations involved.

All contributions to ISO or any of its technical groups are covered by copyright terms stated in [clause 2.13 of the ISO/IEC Directives, Part 1](#) which states, in short, that original owners retain copyright and (effectively) grant license to ISO and ISO to use it in publications and to copy and distribute it within the ISO and IEC

systems. Many contributions come through Unicode, and it operates with very similar terms for contributions.

Contribution of fonts deserves being called out specifically for a couple of reasons: First, fonts are different in nature from submitted documents, and they get used differently. Also, production of UCS charts has long been provided by Unicode, which then contributes the charts to ISO in PDF format. While it is understood in clause 2.13 that *documents* can be copied and distributed with the ISO and IEC systems, that would *not* be appropriate for fonts. In its role of producing charts for the Unicode Standard and for ISO/IEC 10646, Unicode needs license from contributors that allow it to produce Unicode and UCS deliverables, but it exercises *very tight control* over access to the fonts—only a very small team directly involved in chart production have access to contributed fonts.

It should be noted that, while we are not aware of any specific protections for font contributions provided by ISO or IEC, Unicode has IP policies specifically for font contributions that are carefully designed to provide protections for licensors while granting the necessary rights for Unicode to prepare deliverables both for Unicode and also for ISO/IEC 10646. For details, see [Unicode's font submission policy](#) and the [Unicode Font license](#).

These things would be the same in a new MA paradigm:

- For all contributions, the original owners retain full ownership rights, as today.
- Documents contributed to IRG would be subject to the terms stated in clause 2.13 of the Directives, as they are today.
- Documents contributed to Unicode would be subject to very similar terms used by Unicode, as they are today.
- For font contributions, license would be granted for use by the IA in preparing deliverables but limited to terms of a specific font license and with access and usage strictly controlled by the IA.

The second aspect has to do with content related to UCS published by the IA. This is a detail that should be left to be negotiated between ISO CS and Unicode. Such issues are outside the scope of AHG 1 or SC 2.¹

Our understanding is that none of the specific inbound or outbound IP considerations related to MA maintenance processes should be directly stated in the ToR, or in the text of ISO/IEC 10646. In a survey of other MA ToRs and corresponding standards, we found no precedent for that.

2.1.4 Observers

Both China and India raised various points regarding observers. We acknowledge that both N10 and N15 were not sufficiently clear about what was intended.

¹ It should be noted that there are a number of ISO-approved MAs with deliverables published by external organizations. How copyright notices are handled in different cases is not consistent. These are matters between ISO and those organizations.

The main intent in N10 to allow for observers was for *backup*—to have at hand a small pool of people familiar with the MA processes that could easily step into position in the event that one of the voting appointees was no longer available. This was the context for this statement in clause 2.3 within N10:

Within SC 2, any nominated candidates who were not appointed as Voting Members should be given first consideration for observer status.

That statement only made sense in the context of the MA structure proposed in N10, and it was deleted in N15. But the “backup” intent for observers also doesn’t have the same relevance in the structural model proposed in N15.

The intent for observers in N10 and N15 was not *additional oversight*, nor do we think there is such a need: each P-member that wishes already can have a representative with full visibility into MA processes.

We are open to revisiting whether there is a purpose for allowing observers. If the final ToR *does* allow for observers, then we suggest that:

- Observers can contribute documents and comment on proposals (as can be done by anybody during public commenting periods).
- Observers should be invited to participate and contribute in any meetings with additional experts to discuss proposals.
- Observers should be invited to observe closed deliberations within the MA voting group, and at the discretion of the voting members be invited to participate in those discussions.
- Observers should be able to observe *but not participate* in the formal decision making.

It was suggested that the MA should document and publish the list of representatives and observers. That is information that would be maintained by the MAS and that should be available to SC 2 members, *but not be made available publicly*. This is the same policy applied to all ISO and IEC technical groups. For example, the *organizational members* of SC 2 are publicly available, but the names of representatives from the organizational members are available only to SC 2 members. Such a policy is important for protecting the privacy and security of those individuals.

Later, in [section 3.4](#), we will propose changes to the draft ToR in N15 to clarify the status and role of observers.

2.1.5 Allowing for additional AGs

Both China and Japan mentioned the possibility of allowing for creation of additional AGs. Creation of any new AG would involve an SC 2 decision, and SC 2 would always have freedom to do that. For a future AG to have a particular role in MA processes, the ToR could need to be revised to allow for that. To allow for the future possibility of establishing an AG to have a CCA role in relation to certain scripts, language could be

added to the initial ToR to anticipate that. In [section 3.3](#), we will suggest a revision to the draft ToR in N15 to allow for that.

It should be noted that creation of a new AG in a CCA role would be a somewhat “heavy” process: it would require an SC 2 resolution and establishing mechanisms for the AG to take in proposals and to engage in other MA processes, etc. Thus, while we would provide language for the ToR anticipating the possibility, we’re less confident whether it would, in fact, get exercised.

2.2 Position statement from China (N16)

2.2.1. *Voting weight*

See [2.1.2](#) above.

2.2.2 *Conflict resolution*

It’s not clear to us what kinds of scenarios China anticipates. We anticipate that, in many respects, processing of proposals within an MA process will be similar to past practice between WG 2, IRG and Unicode, with the biggest difference being that the process for formal decisions has changed from the DIS/FDIS balloting process in SC 2 to a process done within the SC 2-appointed MA.

For instance, China asks, “*Is there an appeal mechanism if a CCA’s recommendations are repeatedly rejected?*” As proposed in N15, the CCAs would be IRG (reformulated as an SC 2 advisory group) and Unicode. We’re not aware of any past cases in which recommendations from these bodies have been repeatedly rejected.

It would be helpful to understand what kinds of scenarios are of concern. Or, if China were to propose specific changes to the proposed draft ToR in N15, that might clarify the concerns.

2.2.3 *Transition arrangements*

China rightly points out that a plan for transition from the current paradigm to the new will be needed. As the transition will be a one-time process, the transition plan should not be stated within the ToR itself, or even in the text of a new edition of ISO/IEC 10646. Rather, this should be reflected in recommendations from AG 1 to SC 2 and in subsequent SC 2 resolutions.

We propose essential points for a transition plan in section [1.2](#) above.

2.2.4 *IP rights*

See [2.1.3](#) above.

2.2.5 Observers

See [2.1.4](#) above.

2.2.6 Status of “SC 2” liaisons

While the heading of this section mentions “SC2” liaisons, the discussion in that section refers to *category C* liaisons. We’ll comment on both.

Liaison relationships with SC 2 would be *Category A* or *Category B* liaisons. As these are liaison relationships with SC 2, they would not in any way be affected by creation of the MA.

Existing *Category C* liaisons, on the other hand, are in relationship with WG 2. China noted that N10 mentions options for existing Category C liaisons, while N15 does not. In N10, that was provided as a drafter’s note, not as part of the proposed ToR content. While there was no mention in N15, the meta-comment from N10 was still assumed.

Note that the options for current Category C liaisons to WG 2 within ISO/IEC structures do not need to be mentioned in the ToR since they are defined in the ISO/IEC Directives. We have confirmed with the ISO TPM for SC 2 that current Category C liaisons could easily have their relationship transferred to IRG (to be re-constituted as SC 2/AG 1). Or, if they prefer, they could apply to establish a Category A relationship with SC 2.

With Unicode as a designated CCA, Category C liaisons also have an option to establish a liaison relationship with Unicode. In fact, some of these organizations already do independently have a relationship with Unicode.

2.2.7 Participation of individual experts

China notes that N15 does not address how individual experts can participate in the maintenance work. They say,

Under the current WG 2 structure, individual experts have made significant contributions to the development of ISO/IEC 10646.

This would not change. Note that WG 2 has regularly made use of the following leeway provided in [clause 1.12 of the ISO/IEC Directives, Part 1](#) (emphasis added):

1.12.2 The composition of the working group is defined in the ISO Global Directory (GD) or in the IEC Expert Management System (EMS) as appropriate. Experts not registered to a working group in the ISO GD or the IEC EMS, respectively, shall not participate in its work. **Convenors may invite a specific guest to participate** in up to two meetings to provide relevant expertise to the working group and shall notify the guest’s National Body of the invitation ahead of the meeting via the Office of the CEO (copying the Secretary/Committee Manager of the committee).

Various SC 2 member bodies have frequently brought expert delegations to participate in WG 2 meetings, with the invitation of the convenor, without having those experts formally registered as part of WG 2 in the ISO GC or IEC EMS.

Both N10 and N15 explicitly allow for involvement of additional experts. A general statement is given in 2.4 of N15 (emphasis added):

The Representatives have a duty to actively participate in all discussions and to cast a vote in all ballots to resolve a change request. **In performing their function, they can consult further knowledgeable Experts** on individual characters, writing systems or on character coding during the Registration (see 5.1), Commenting (see 5.2) and Resolution (see 5.3) phases.

Engagement of additional experts is also mentioned in 5.3—for example, the following from point 1a):

Each CCA may schedule meetings of experts to discuss CRs. These meetings may include experts nominated by SC 2 members or liaisons, or any other experts as considered appropriate to the CCA.

Several other references to additional experts are included.

In [2.1.1](#), we discussed comparisons with WG 2, and mentioned the importance of distinguishing between different phases of process. In earlier phases, we think there should be a lot of flexibility for engaging with additional experts. Anticipating Unicode in its role as CCA, Unicode regularly engages with proposal authors at the beginning of the process, helping them in preparation of mature proposals, and often seeks out other script experts to gain broad perspective. As WG 2 has often done in the past, we would expect the MA participants to similarly engage with proposal authors and other experts.

But as also noted in 2.1.1, the decision phase in the MA process should be compared to SC 2, with its more limited participants, rather than WG 2. We would want the MA participants to have freedom to have closed discussions among themselves in which they can freely express views *in their role of maintaining the quality and coherence of UCS*.

Thus, we expect MA processes to include engagement with experts, and would want the ToR to provide flexibility to MA appointees in how they do that, avoiding *overstating* how experts should be engaged lest that flexibility be limited.

2.2.8 Process for new script proposals

China says,

While the proposal clearly divides responsibility between the Unicode Consortium (non-CJK) and IRG (CJK), it does not specify the mechanism for proposing new scripts, particularly ancient or specialized scripts.

We are a bit puzzled by this generic statement as Unicode regularly and for many years has processed proposals for new scripts, including many ancient and specialized scripts. For example, in the last few years, Unicode has successfully handled extensive additions for Cuneiform and for Egyptian Hieroglyphs, and is supporting the work of experts preparing a proposal for Mayan Hieroglyphs.

However, China provides *Oracle Bone Script* as a specific example. We recognize that there are historical, ideographic scripts of Asia for which script experts could be concentrated in east Asian regions.

We distinguish two kinds of expertise that are needed for successful encoding: (i) *script* expertise, and (ii) expertise in character encoding and in the architecture of UCS and technology implementations that build on it. Currently IRG and Unicode between them provide a considerable degree of both. But there are cases in which experts with general expertise on encoding need to partner with others that have specific script expertise.

We can consider Small Seal Script as a current example: most of the work required has been done by *script* experts. In the current WG2/IRG/Unicode paradigm, work on a Seal has progressed, but mainly with the script experts working outside of any ISO group to develop a mature proposal. IRG has not had any role in that work (having ruled it outside their scope some years ago). WG2 has not had significant contribution to the work beyond providing a context in which the proposal authors could present the status of their progress. The same has been happening on the Unicode side, with the proposal authoring group represented by Michel Suignard.

If there is a future situation in which another CCA for specific scripts might be needed, allowance can be made for creation of a new AG under SC 2—this is discussed in [2.1.5](#), above. But it isn't unreasonable to suppose that MA processes with just Unicode and AG 1 as CCAs might work in most situations, with one (or both) of these CCAs overseeing, facilitating and guiding a group of script experts to prepare a sound and mature encoding proposal.

2.3 Position statement from India (N17)

India's comments included *Pros* and *Cons*. We appreciate their *Pro* observations. We will respond on select comments.

2.3.1 *Pros-4 / Cons-2: Observers*

India's comment suggests the role of observers in MA processes is for oversight. See the discussion above in [2.1.4](#).

2.3.2 Cons-1: IA role in the MA Voting Group and in SC 2

India comments that the maximum number of IA representatives is not clearly defined. It's important to understand roles and representation in different phases of MA process. See [2.1.2](#) above.

India also comments,

Furthermore, the IA is also given a Category A liaison role with SC 2. It is unclear why these two functions cannot be combined into a single role to avoid duplication.

Unicode's role as IA within the MA is quite distinct from its role as a Category A liaison in SC 2. While not stated in Annex G of the ISO/IEC Directives, Part 1, we are aware of cases from other MAs in which ISO has required agencies to have a Category A liaison relationship with the parent committee as a prerequisite to having a participant role within an MA. So, in the general case these are clearly seen as separate roles. There is no duplication.

2.3.3 Cons-3: Chairperson tenure

While N15 allows for a chair to be re-elected for five additional terms, India comments, "this seems excessive and could create a monopolistic or entrenched leadership structure." This is a reasonable concern. There is also a different concern, however, which was in mind when N10 and N15 were drafted: SC 2 has recently experienced a crisis situation in which nobody qualified was available to take over a leadership role when the previous leader (Alain Labonté) was no longer available for that role. We would caution that the number of terms not be too limited to ensure the MA doesn't face a similar crisis in the future.

2.3.4 Cons-4a: Document repositories

India notes that N15 does not specify where CCA document repositories will be located. Both prospective CCAs, Unicode and IRG, have existing document repositories. We think these should be used.

We would recommend that the ToR not overstate requirements, which could limit flexibility. The one requirement that we might consider would be to specify that any proposed CCA needs to be able to provide a public document repository with reasonable confidence that this will remain so indefinitely.²

2.3.5 Cons-4b: Changes requiring explicit approval

India comments,

Additionally, the draft exempts CRs related to "informative" aspects of the UCS repertoire from requiring explicit Voting Group approval. While new scripts and characters are excluded here, other changes (e.g., renaming blocks, editing chapter text) could have significant cultural or socio-political implications. Such changes should also require Voting Group approval.

² In this regard, we note that Unicode has a very good track record, and that its hosting of WG 2 documents has improved upon the prior arrangements for WG 2 documents.

It's not clear to us exactly what changes India has in mind. Renaming of blocks and chapter text are mentioned.

- “Block name” could refer to two things: formal block names or chart headings. Formal block names are *normative*, and once created are never changed. The headings that appear on code charts are informative, though it's not clear to us why a formal Voting Group approval would be helpful: there is already a conservative disposition toward changing chart headings.
- The UCS has no “chapter text” other than the core content of ISO/IEC 10646, which is not in scope for possible change by the MA—that can only be changed by SC 2 process.³

2.3.6 Cons-5: Notification of CR rejections

Whereas the proposed text in clause 5.2 of N15 requires CCAs to notify the Voting group of rejected proposals “within four months”, India suggests that reporting should be more frequent, “such as fortnightly”. We don't think this requirement aligns to actual practice: Apart from emoji character proposals that Unicode receives (in the hundreds over a few months of open submission), there are not many proposals that either Unicode or IRG receive that could qualify potentially for encoding but that are deemed “outside the scope of acceptable changes”. When such a case arises, it can sometimes take some time to reach that determination. The most recent example that comes to mind was a proposal to encode the Ethereum symbol: this was deemed out of scope due to IP-related constraints, but it took several months to make that assessment.

2.3.7 Cons-6: Frequency of meetings

N10 and N15 did not specify a required frequency for Voting Group meetings because that would only limit the flexibility of the MA to do what it needs. The drafts do specify outer time limits to ensure that proposals are not hindered from lack of engagement. We think this is sufficient.

2.3.8 Cons-7: Voting period

India comments,

The current provision allows only seven days for Voting Members to cast their votes after the commenting phase.

The seven-day period is only required for votes on procedural matters, not for the final vote to accept or reject the proposal, for which the default is 20 days. ; Further, the procedure involves a 40-day delay between the end of the commenting phase and the start of the final vote, which can be shortened only by consensus. We see that 5.4.1 is not clear in this regard. In [section 3.6](#), we will propose revisions to the proposed draft in N15 regarding this.

³ Perhaps India is thinking of the Unicode core specification. If so, that is part of the Unicode Standard and is outside the scope of SC 2 and WG 2 and would be outside the scope of an MA.

2.3.9 Cons-8: Accelerated commenting period

India comments,

The commenting period for P-members is normally four months but may be reduced to six weeks in urgent cases. However, the draft does not specify who has the authority to reduce this period. At present, it appears to be left to the discretion of the MA. This decision-making power should be clearly defined and made transparent.

The commenting process is coordinated by the CCA, and so the intent is that acceleration of the commenting period is by discretion of the CCA when there is a perceived urgency. In [section 3.8](#), we will propose revisions to the proposed draft in N15 that will provide some clarification.

Note that, if a CCA opts for a shorted voting period, when it comes to the Resolution phase, the Voting Group can decide that the proposal has not been sufficiently reviewed, and have that proposal reverted to the Commenting phase (see point 4 in Clause 5.4.2 of N15).

2.4 Position statement from Japan (N18)

Some of Japan's comments note that issues they had raised in SC 2/N4906 before the formation of AHG 1 as needing consideration have been addressed within AHG 1. We will not reply on those points.

2.4.1 MA relationship to SC 2

Japan recommends that there be clear mention that the MA is part of SC 2. This is reasonable. In [section 3.2](#), we will propose a revision to the proposed draft ToR in N15 to this effect.

2.4.2 Allowing for additional AGs

See [2.1.5](#) above.

2.4.3 Communication of status to SC 2

Japan comments,

... a clearer definition of the process is needed of how SC2 members will be informed about the status of discussions within MA.

In N15, communication of status is mentioned at some points, with communication either directly to all SC 2 members (in coordination with the MAS), or to the MA Voting Group. In the latter case, we assume that P-member representatives within the Voting Group can communicate with their NB as they deem necessary.

Places in N15 at which such communication is required include:

- Clause 5.2, point 2 b): CCA informs the MA Voting Group if a proposal is not excluded by stated criteria yet the CCA nonetheless deems the proposal to be out of scope.
- Clause 5.3, point 1 e): After a proposal for new scripts or characters has been registered, all SC 2 members are notified to solicit input from national body experts.

We do note that N15 does not mention communication to SC 2 members after decisions are taken. Later in this document, we will propose a revision to the proposed draft of N15 addressing this (see [3.9 below](#)).

2.4.4 Prioritization of NB comments

Japan comments,

We also recommend considering procedures that give priority to comments from National Bodies over public comments.

It's not obvious to us how this might be formalized into the ToR, or even whether it is necessary: P-member representatives within the MA will have voting rights, while public commenters do not. This implicitly gives greater priority to NB comments.

2.4.5 Exception handling

Japan comments that clause 5.6 in N15 requires clarification on steps to be taken. We anticipate cases in which this process is invoked will be rare, and we're not confident we could predict what their nature would be. For that reason, we are comfortable with the proposed text in N15, which leaves determination of appropriate steps to the SC 2 Secretariat. If Japan experts prefer more specificity, however, we invite them to propose revisions to the proposed draft text.

2.4.6 Copyright notices

See [2.1.3](#), above.

2.5 Position statement from Canada (N19)

We note Canada's agreement with the "two house" / "bicameral" model proposed in N15 in which SC 2 and Unicode participate as equal partners with final approval for changes requiring separate approval from each. We also note that, given provision in this model for SC 2 P-members to have voting representation within the MA, Canada recommends that SC 2 migrate to a Maintenance Agency.

Canada also noted a detail in 5.4.2 of N15 requiring revision. We will propose changes related to this below.

3. Comments on N15 and proposed changes

3.1 General comments

We consider N15 a good improvement over N10, and a useful document to continue working from. We recommend that AHG 1 adopt this as a working draft.

In the following subsections, we will propose revisions to specific sections of the draft in N15.

3.2 Relationship of MA to SC2

Comment: Japan recommended that the relationship of the MA to SC2 be clarified (see [2.4.1 above](#)).

Proposed change: Revise the start of the first paragraph of 1.2 (“The primary role...”) as follows:

The ISO/IEC 10646/MA is established and governed by ISO/IEC JTC 1/SC 2. Its primary role is to maintain...

3.3 Additional AGs

Comment: China and Japan suggested allowing for creation of additional Advisory Groups (see [2.1.5 above](#)).

Proposed change: Revise clause 2.2 as follows:

2.2 Character Coding Agencies

Character Coding Agencies (CCAs) are established to process and evaluate proposed changes to the UCS repertoire and to provide recommendations to the Voting Group (2.4). See clause 4 for details.

The following two entities are designated as CCAs:

- The Unicode Consortium
- ISO/IEC JTC 1/SC 2/ AG 1, *Ideographic Research Group*

Replacement or removal of either of these CCAs shall require revision of this document.

As described in clause 4.1 these two CCAs have complementary roles in relation to different classes of characters that are encoded in the UCS.

ISO/IEC JTC 1/SC 2 can establish other advisory groups for specific tasks that can include preparation of proposals or recommendations for particular UCS changes to be considered by the MA. Such an advisory group can have a limited duration, while the specified proposals or

recommendations are being prepared, and their proposals or recommendations should normally be routed to the MA via one of the designated CCAs.

In addition, SC 2 may also establish another advisory group to function as an additional CCA. Such an advisory group shall be explicitly designated by SC 2 as a CCA within the ISO/IEC 10646/MA structure and shall be given an explicit scope of responsibility. Such a CCA shall be subject to the terms of this document regarding CCAs.

3.4 Observers

Comment: Questions regarding the status and role of observers were raised by China and India (see [2.1.4 above](#)).

Proposed change: Insert the following as a new subclause after 2.4, and renumber following subclauses accordingly.

2.5 Observers

The CCAs and SC 2 P-members that have appointed Voting Group members may each also appoint an observer who can observe Voting Group processes but have no vote on decisions. The primary purpose for allowing observers is to provide each appointee another person representing the same agency that is familiar with current Voting Group work items that they can confer with, and that could replace them if the appointee is no longer available. (Such replacement shall be subject to appointment by the CCA or P-member.)

Observers may contribute documents or submit comments on proposals. Observers should be invited to participate and contribute in any meetings between Voting Group members and experts to discuss proposals. Observers should be invited to observe closed deliberations within the Voting Group and, at the discretion of the Voting Group members, to participate in those discussions. Observers should be able to observe but shall not participate in Voting Group decisions.

The list of appointed observers shall be made available to SC 2 members.

3.5 Glyph changes requiring approval

Comment: In the proposed draft ToR in N15, clause 5.1 lists among changes that require an explicit decision “changes to representative glyphs”. In discussion with the current project editor, Michel Suignard, we consider this wording to be too vague and general: some glyph changes are minor and should be considered editorial in nature, not requiring an explicit decision. The concern that led to this being included in the draft ToR was specifically for *significant glyph changes* that could affect character identity.

Proposed change: In 5.1, revise the third bullet point after the third paragraph (“Changes to representative glyphs”) as follows:

Significant changes to representative glyphs that could affect character identity.

3.6 Voting period duration

Comment: It is apparent from the comments submitted by India that the duration of the Voting Period described in clause 5.4.1 is unclear.

Proposed changes: Part of the confusion is that 5.4.2 in N15 describes an overall process for the resolution phase, while 5.4.1 describes how voting is done within that process. We propose re-ordering these subclauses so that the overall process is described first. Also, the intent was to distinguish between decisions on CRs versus decisions on procedural matters, with a seven-day voting period for procedural matters, but longer periods for CRs. We will propose revising specific wording in these two sections to clarify this distinction.

The proposed revised text for all of 5.4 will be shown below, in section [3.10](#).

3.7 Deliberation period during the resolution phase

Comment: Canada noted a need for some revision to subclause 5.4.2 of N15 (see [2.5](#) above). We also notice an issue in 5.4.2 regarding ensuring that CRs progress toward a vote in a reasonable time.

In particular, the current wording in item 5 of 5.4.2 allows the Chair to delay voting indefinitely. (The Chair initiates a Decision process when determining there is consensus of readiness, but the Chair is the one determining that consensus.) The same issue was present in N8 and N10. This differs from the ToR for ISO 639/MA, where a lack of consensus leads to a meeting which must result in a decision to vote or a request for modifications to the CR.

Proposed changes: We propose changes in that subclause that make *Deliberation Period* a defined term, state that this period is bounded and extended only as described in the ToRs, and that a vote occurs at the latest at the end of the deliberation period. We will provide proposed text for a revision of subclause 5.4 in section [3.10](#) below, incorporating changes for this issue.

3.8 Process for accelerated commenting and resolution phases

Comment: India commented that the procedures for accelerated commenting phase for urgent cases need clarification (see [2.3.9 above](#)). Also, in separate communication with Joshua Tsai, a concern was noted that the need for accelerated processing needs to be communicated in advance.

We further note a potential issue in clause 5.4 that the resolution phase could progress without consideration of expressed urgency. In particular, the procedures should not give the Chairperson of the Voting Group a veto on the accelerated handling of the proposals.

Details: In clause 5.4 of N15, the resolution phase lasts 60 days by default (40 days of the deliberation period + 20 days of the default Voting Period). Assuming the Voting Group agrees to handle a particular Change Request with urgency, it can be brought down to 21 days (14 days of notice for a meeting, consensus at the meeting to proceed to a vote, minimal Voting Period of 7 days). However, at the sole discretion of the Chairperson of the Voting Group, the resolution phase can be extended to 100 days even if the rest of the Voting Group agrees that the matter is urgent (the chair can request and grant a 20-day extension of the deliberation period, can object to proceeding immediately to a vote during that period, and can then set the Voting Period to its maximum duration of 40 days).

Proposed changes: We propose changes in item e) of subclause 5.3 to clarify process during the commenting phase, and changes in 5.4 to better specify process during the resolution phase.

In 5.3, we propose that item e) be revised as follows:

e) In the case of proposals for new scripts or characters, the CCA in coordination with the MAS shall notify all SC 2 members to solicit input from national body Experts. This shall normally be done at least four months prior to when the CCA submits a recommendation to the Voting Group for a decision. In exceptional cases involving urgently needed characters, the CCA may reduce the duration of the commenting period to six weeks. In that case, at the beginning of the commenting period, the CCA shall notify the Voting Group that the characters are urgently needed. National body experts are expected to respond within the specified commenting period. If needed, national bodies may request one 40-day extension to submit comments. During the first week of the commenting period, any Representative may notify the Voting Group that the characters are urgently needed.

We will provide proposed text for a revision of subclause 5.4 in section [3.10](#) below that incorporates the proposed change to that subclause. (Specifically, a new item 2 is inserted into the steps, step 6 describing voting periods is revised, and NOTES are added following the steps.) The following notes provide some rationale for the changes proposed.

Notes: A Decision at the start of the resolution phase that the Resolution is urgently needed functions as a closure motion (*cf.* the motion that the question be now put, *vel sim.*). Urgent processing of the proposal is subject to a separate Decision of the Voting Group: if it fails, the proposal proceeds normally. This makes it possible for Representatives to express a disagreement with the urgency while supporting the proposal in principle.

In order to guarantee a right to notice, the notification that the characters are urgently needed must occur during the first week of the Commenting phase, and at the start of any accelerated Commenting phase, resulting in a minimum of six weeks of notice before the start of the closure motion. Only the CCA may shorten the commenting period, as this may have logistical implications for the internal processes of the CCA.

There is no need for a separate mechanism for the Voting Group to override the decision of the CCA to shorten the commenting period. Indeed, if the CCA shortened the commenting period, but the Decision that the Resolution is urgently needed is rejected, one possible outcome is for the Voting Group to reject the proposal and reset it to the Commenting phase by consensus, see Subclause 5.4.2, item 7.b.i.

3.9 Communication of decision to SC 2

Comment: Japan noted that there is no mention in N15 of communication of decisions to SC 2 (see [2.4.3 above](#)).

Proposed changes: We propose stating this explicitly in the final step for the resolution phase in subclause 5.4. We will provide proposed text for a revision of subclause 5.4 in section [3.10](#) below that incorporates this.

3.10 New proposed text for clause 5.4

With the proposed revisions described in principle in the preceding sections, we propose replacement of 5.4 in N15 with the following.

5.4 Resolution phase

5.4.1 Resolution procedure

Objective: Deliberation within the Voting Group based upon results of a call for comments and CCA recommendations, followed by formal voting to approve or reject the CR.

Oversight: Chairperson.

Input: The Voting Group receives the CR, comments and recommendations from the CCAs.

1. The results of the Commenting phase (5.3) for a CR are circulated within the Voting Group for consideration. This initiates a *Deliberation Period* for consideration of the CR within the Voting Group; its duration is initially set to 40 days.
2. If, during the Commenting phase, the Voting Group was notified that the characters are urgently needed, the Chairperson shall immediately initiate a Decision that the Resolution is urgently needed. If the Decision that the Resolution is urgently needed is taken, the *Deliberation Period* is terminated, the Chairperson shall immediately initiate the Decision on the Resolution (item 6), and the Voting Period is accelerated (item 6). If the Voting Group was not notified that the characters are urgently needed, or if the Decision that the Resolution is urgently needed is rejected, the non-accelerated process in these steps continues.
3. At the discretion of the Chairperson or by request of a Representative, a meeting may be scheduled for discussion of the CR within the Voting Group. Such meetings may be conducted online with at least 14 days prior notice. A meeting to discuss a CR shall not take place later than seven days prior to the end of the *Deliberation Period* for that CR.

4. Within 40 days, the Chairperson will query the Voting Group to assess readiness to proceed to a vote. If any Representative requests additional time for deliberation, 20 additional days shall be added for further deliberation. In exceptional cases involving urgently needed characters, the Chairperson may overrule this request, in which case an extension of the Deliberation Period shall be required only if requested by consensus of the Representatives other than the Chairperson present at a meeting, or by a Decision of the Voting Group taken prior to the end of the Deliberation Period. After the first extension, further 20-day extensions shall be required only if requested by consensus of the Representatives present at a meeting or by a Decision of the Voting Group taken prior to the end of the Deliberation Period.
5. If it is determined by consensus of Representatives present at a meeting, or by a Decision of the Voting Group taken prior to the end of the Deliberation Period, that the CR has not been sufficiently reviewed, that additional Expert input is required, or that some aspect of the CR requires revision, then the Voting Group shall provide written instructions to the relevant CCA regarding what additional input or changes to the CR are required, and the CR is reset back to the Commenting phase.
6. When there is consensus that the CR is ready for a Resolution, or at the end of the Deliberation Period if there is no such consensus, the Chairperson shall initiate a Decision. The ballot shall clearly communicate the proposed changes to be decided. The Voting Period shall normally be 20 days; if more time is requested, the Chairperson may extend the Voting Period up to 40 days total; when a Decision has been taken that Resolution is urgently needed (see item 2 above) the Voting Period shall be 7 days.
7. A vote opposing the proposed change shall be accompanied by written reasons for opposing the change.
8. After the Voting Period has concluded, the following are possible outcomes:
 - a) If the Decision is taken, then the proposed changes are approved, and the CR progresses to the Implementation phase (5.5).
 - b) If the Decision is rejected, then:
 - i. By consensus within the Voting Group, the CR may be reset to the Commenting phase, with written instructions to the CCA for further information or revisions to the CR; or
 - ii. The CR is rejected, and the case is resolved.
9. Decisions to resolve a CR with either approval or rejection of changes shall be publicly documented, and the Submitter shall be notified. Notification of a rejection should include a statement explaining the grounds for rejection. In coordination with the MAS, SC 2 shall also be notified of Resolutions. This may be done on a periodic basis (e.g., quarterly).

NOTE 1 The Voting Period for the acceptance of a CR only starts after a Deliberation Period, not at the end of the Commenting phase. The default duration of the Resolution phase is thus 60 days, with 40 days of Deliberation Period and 20 days of Voting Period.

NOTE 2 When the CCA deems that characters are urgently needed, the Voting Group will be notified at the start of the commenting period (see item e) in subclause 5.3). Item 2 above allows for a decision to move immediately to a Decision, which terminates the Deliberation Period of the

Resolution Phase. Given the early notification of urgency from the CCA, it is expected that the Voting Group will deliberate among themselves as needed during the commenting phase.

NOTE 3 As meetings are scheduled at least seven days prior to the end of the Deliberation Period, it is possible to initiate a Decision to extend the Deliberation Period at these meetings.

NOTE 4 Consensus is defined by ISO/IEC Guide 2:2004, entry 1.7, and the ISO Directives, part 1, subclause 2.5.6.

5.4.2 Decision process

During the Resolution phase, the Voting Group shall seek consensus before taking Decisions, but always takes Decisions by a vote according to the process given below. Decisions other than decisions to approve a CR are considered *procedural*.

1. At the Chairperson's discretion or at the request of any Representative, the Chairperson shall issue a ballot. For procedural matters, the Voting Period for the ballot shall be seven days. For approval of CRs, the Voting Period for the ballot shall be as described in subclause 5.4.1.
2. Representatives each cast a vote in favour or against the ballot, or abstain. Failure to vote within the Voting Period is counted as an abstention.
3. At the end of the Voting Period, the Primary Representative of the IA shall communicate to the Voting Group the position of the IA based on the votes of the IA representatives.
4. The Decision is taken if and only if both of the following conditions are met at the end of the Voting Period; otherwise, the Decision is rejected:
 - a. The Primary Representative of the IA communicates that the position of the IA is in favour of the Decision.
 - b. Two-thirds of the votes from P-member Representatives, excluding abstentions, are in favour of the Decision.

NOTE During meetings of the Voting Group, procedural matters, but not CR resolutions, can be decided by consensus of the Representatives present (see items 3 and 4 in subclause 5.4.1). At the request of any Representative, such a matter is instead ruled on as formal Decision with a vote as described in this subclause.

Output: A formal CR vote has been carried out, usually resulting in its acceptance or rejection. On Acceptance, a CR progresses to the Implementation phase.