

**beginning of Canada comments** \_\_\_\_\_

From: Doug, Langlotz <dlanglotz@scc.ca>  
Subject: REVISED Canadian reponse 22N2844

Canada SUPPORTS the document with the attached comments:

"Canada wants to make sure that relative weights in the template respect those of special characters as in Canadian standard CAN/CSA Z243.4.1.-1999. Furthermore Canada insists that this International standard shall allow to declare a minimal Canadian delta without having to do prehandling (the delta shall be specifiably simply by declaring a modification of the table), in order to fit with Canadian industry practice. Canada will not accept any change that would jeopardize that objective."

SE:

We cannot accept a "reorder-after" as part of the template. However, the by us suggested rework of level 4 allows to accommodate a reasonable (and fully tailorable) order of "special characters" (punctuation and symbols) without any reorder-after or similar.

Prehandling or tailoring will be necessary for the Thai and Lao scripts by default (see UTR#10 and the US comments and N668 on Thai). On the other hand, those scripts are not in great use in Canada. Immigrants and visitors may still expect Thai and Lao script strings to collate properly. [This can be done also by a tailoring (see N668), and such tailoring examples should be included on an accompanying CD.]

In addition, collation of items containing version numbers, street numbers and the like will still require prehandling to get properly collated.

\_\_\_\_\_ **end of Canada comments;**

**beginning of Denmark comments** \_\_\_\_\_

From: Pia Junker Hviid <ph@ds.dk>

Subject: Danish vote on JTC1/SC22, N 2844

We can inform you that Denmark votes NO on ISO/IEC FCD 14651, N 2844 with the following comments:

1. The main table should be included in the standard ad verbatim.

SE:

One format for it, yes, for review and information purposes. And that should be the XML format one. On an accompanying CD/DVD (not even nearly filled...) (and some web site; but that is hard to get permanent enough) various versions may be accommodated in easily machine-readable format. UCA version, two XML versions (with a DTD each), one with normative data (the format itself is still not normative), the other informative, a POSIX LC\_COLLATE version, a Sybase version. And some non-normative tailoring examples (at least: English (small!), 'Canadian', Danish, Swedish, two German (Ä (Ü, Ö) as variant of AE (UE, OE) or as variant of A (U, O)), Japanese for proper handling of length marks, Thai and Lao with reordering embedded in the tailoring), as well as some test data.

2. The weights on the second level should include a <BLANK> weight for all letters with accents, to ensure as equal treatment as possible of fully composed characters and split-up characters, in non-normalized text. This addresses 6.1.1 note 1, which should be removed.

SE: agree

3. In clause 5, The notation "UXXXXXXXX" should also be allowed.

SE: ok; but the Pyyyyyy should be removed; see also DE comments

4. In the main table, the control characters of ISO/IEC 6429 C0 and C1 should be included, and ISO 6429 be added to clause 3, references.

SE: all control characters, except nl, cr, and tab, but including BiDi controls and the like, should be ignored at all levels 1-4!

5. in 6.2.2.2 description of level 1, please change "basic letter" to "first-level letter". any basic letters of for example the Latin script are not sorted uniquely at level 1, eg: Æ, Ø, Å. Also for the description of 2nd level: it is culturally dependent what "diacritics" means, and the term should be avoided in an international standard. For example "Ø" and "Å" are not diacritic letter, but base letters, in some languages. There is no diacritic in these letters.

SE: true, but first-level letter is strange too.

5. in 6.3.1 - the BNF should be terminated with a semicolon.

SE: the BNF should be replaced with an XML DTD (which includes some BNF in DTD's own format); that would simplify this considerably!

6. in 6.3.1 rule 13 should also allow for a '<U' eight\_digit\_hex >'

7. 6.3.1 and 6.3.2 should be explained in terms of a narrative description as the 14652 LC\_COLLATE category specification.

SE: a(nother!) narrative on this can go into annex D

8. 6.3.1 should be aligned with the 14652 BNF for LC\_COLLATE, also in terms of terminology used..

SE: no, use a DTD instead! See N639.

9. There should be tokens "LC\_COLLATE" and "END LC\_COLLATE" to surround the whole specification in 6.3.1.

SE: no, use a DTD instead!

10. 6.3.1 rule 8: space should consist of one or more spaces or tabs.

SE: automatic with a DTD instead

11. 6.3.1 rule 28: The name should be "section-symbol".

12. in 6.4 references to 6.3.1 terms should be in italic.

13. The examples with reorder-after should use "-" instead of "\_" in the keywords.

14. 6.5 - The name should be following ISO/IEC 15897 naming.

15. in Annex B.1 the line 5 should have <> around TABLE, as in  
order\_start <TABLE>;....

16. Annex B.2 : change "assumption that character mnemonics are resolved into UCS identifiers" to "mnemonic identifiers for UCS defined in ISO/IEC 14652"

SE: NO, definitely not! Instead, replace the example tailoring with a/several proper one(s); see e.g. N640.

17. Key generation on-the-fly should be described, eg as a note at the end of 6.1.2, saying that comparison with keys generated on-the-fly character for character is an equivalent way of implementing the key generation, and may eliminate elaborate key generation when a difference is to be found in the first few characters.

SE: well, that is allowed for anyway. This is a detail low-level implementation issue, and is even **completely automatic** in some programming languages (not even the application programmer needs to do anything special to get this behavior). We need say nothing about it in 14651.

18. Position should be specifiable on all levels, as it is legacy from POSIX.

SE: no.  
a) It should be possible to specify backwards on levels 2 and 4.  
b) "position" must not be allowed for any level.  
c) for subkey length reduction methods that do not change the ordering see suggested annex Q (N642).  
d) allow for declaring 'neighborhoods' for some weights, these can, but should not be required to, be used by one of the methods described in annex Q.

19. Toggles "ifdef" etc as in 14652 should be reintroduced.

SE: they don't appear useful enough. Note that the data format is normative for annex A only. Nowhere else.

20. The conformance clause needs to be reformulated. It should not be possible to claim conformance to 14651 if full tailoring is not available with the application. That would mean that eg. Danish specifications cannot be accommodated by the application and that defeats the main purpose of this standard. The conformance clause does not read as English. It should also be possible for a specification to claim conformance - possibly in the way of 6.4 tailoring.

SE: hmm, yes. Many systems have 'fixed' tailorings, just accessed by name or similar. Shall we require that "end users" must be able to do detailed tailoring? Which end-user (programmer, ATM user)?

21. The Danish test data in annex B should be replaced with the following:

A/S

ANDRE

SE: N after S?

ANDRÉ

ANDREAS

AS

CA

ÇA

CB

ÇC

DA

ÐA

DB

ÐC

DSB

D.S.B.

DSC

EKSTRA-ARBEJDE

EKSTRABUD

EKSTRAARBEJDE

SE:

AA as Å gives a somewhat strange result here. Do DS really want that?

HØST

HAAG

HÅNDBOG

HAANDVÆRKS BANKEN

Karl

karl

NIELS JØRGEN

NIELS-JØRGEN

NIELSEN

SE: E after J?

RÉE, A

REE, B

RÉE, L

REE, V

SCHYTT, B

SCHYTT, H

SCHÜTT, H

SCHYTT, L

SCHÜTT, M

ß

SS

SSA

STORE VILDMOSE

STOREKÆR

SE: K after V?

STORM PETERSEN

STORMLY

SE: L after P?

THORVALD

THORVARDUR

ÞORVARÐUR

THYGESEN  
Vestergård, A  
Vestergaard, A  
Vestergård, B

SE:  
to collate AA as Å is more a phone-book like thing to do on a per  
name basis, rather than 'every AA'. Or?

ÆBLE  
ÄBLE  
ØBERG  
OBERG

SE: O->Ö?

\_\_\_\_\_ end of Denmark comments;

**beginning of France comments \_\_\_\_\_**

TITLE: French ballot comments on ISO/IEC FCD 14651 - Method for Comparing Character Strings and Description of a Common Tailorable Ordering Template

SOURCE: AFNOR

DATE: 1999-04-08

France votes YES on FCD 14651, with the following comment:

Insufficient effort has been done to define an acceptable ordering for some lesser-used scripts.

A lot of scripts are actually ordered based just on Unicode code values. When WG20 can find some existing practice of a culturally accepted ordering not conflicting with another one, these practices should be included in FCD 14651 default template ordering.

We suggest that experts of those scripts should be invited to define a correct default ordering.

For example, this is the case for Tamil (like most other indic scripts) and Thai scripts, where evidence of existing practice has been demonstrated and no evidence of other equally valid practice has been found.

However, considering these issues are more of a concern for national bodies where those scripts are in widespread use, and even if there is a Tamil community in the French territory Reunion Island, we suggest that this work should be done, perhaps in a future amendment to this forthcoming standard.

As the same problem exists with any new codepoints added in the UCS, we also suggest that we should contact ISO/IEC JTC1/SC2/WG2 to ensure the existing procedures to register new characters are adjusted to include the needed informations to update the forthcoming collation standard.

\_\_\_\_\_ **end of France comments;**

**beginning of Germany comments \_\_\_\_\_**

The German member body vote is "No" with comments.

If the technical comments are resolved satisfactorily, the German "no" vote will be changed to a "Yes" unless other significant changes be made to the standard in an unsatisfactory way.

## Introduction

## General

Germany wishes to thank the editor for many fundamental improvements of this draft over the previous FCD. They greatly increase the usefulness of the future standard and render void many essential German concerns.

German comments touch upon two principal points:

Technical comments on the body of the draft and on Annexes\_B-E;  
Comments on the normative Common Template Table (Annex\_A).

Germany does not comment on matters of English style as it is expected that this will be improved by native English speakers. Lack of explicit comments on this should not be taken as endorsement of a style that is, as yet, not always a paragon of clarity. There are many paragraphs where "loose ends" are noticeable, caused probably by numerous cuts and reworkings over time. Furthermore, Germany does not comment on purely typographic deviations from the ISO drafting rules (e.g. semicolons ought to be used to terminate items of unordered lists). It is confident that these points will be addressed by the editor at a later stage.

## Comments on the body of the draft

## Introduction, 2nd paragraph

This paragraph should best be removed altogether, or at least reformulated in such a way that it does not imply any more that the syntax of the Common Template Table (hereafter CTT) is in any way normative. The current formulation of the whole paragraph is unfortunate in this respect. The draft does not -- and must not -- mandate that conformant applications can either directly exchange ordering specifications or even use the CTT in the syntax used in Annex\_A.

SE: agree

To stress this point, it is advisable to add another annex with the specification of another possible syntax. The XML-conformant Swedish suggestion can serve as a useful starting point.

SE: Make an XML version of the table the one printed and the one with the normative data (not format). Add further formats with the same data (or an as close an approximation as possible) in an accompanying CD (and at a stable web site, if possible).

## Introduction, 4th paragraph

Remove 2nd sentence.

SE: agree

## Scope: 1st dash

Remove text in brackets ["(independently of coding)"]. Change the formulation in the remainder of that paragraph to stress that mappings from ISO/IEC\_10646 to any other coding scheme are also permissible.

SE: agree

Scope: 2nd dash

Remove phrase "using a variant of the Backus-Naur Form (BNF)" as the reference format as such does not use the BNF. It is simply `<em>defined</em>` using the BNF syntax.

SE: agree; but we should use XML instead.

Scope: Note

Remove note.

Scope: Additions

Add an entry under the heading "This International Standard does#/+not#/-mandate" to stress that no preparatory procedures are prescribed, but is normally necessary. Give a reference to Annex\_C.

SE: agree

Definitions: 4.9

The term `<em>depth</em>` does not elucidate the problem but rather explains an X with an Y. Either define the term or chose a different formulation.

SE: see list of definitions in the SE comments.

Definitions: 4.10

The `<em>reference comparison method</em>` should be defined or explained in more detail before.

Definitions: 4.11</CommentOn>

In the context of this draft the "set of strings" can always be understood as having one and only one member (no preparatory procedures are part of the standard itself). Therefore change the formulation accordingly.

SE: the "set of strings" is all the strings about to be collated

Definitions: 4.11 (suggestion)

Replace the word `<em>order</em>` by `<em>sequence</em>` and reformulate the phrase accordingly.

Symbols and abbreviations

Simplify the matter of code-dependence on ISO/IEC\_10646. Any application is conformant that is able to achieve identical results as those of section\_6, but not necessarily in the same way. A mapping between some encoding system and the UCS and back can be seen as a special case of the preparation of character strings (cf.\_6.1.1) and of the presentation of the resulting sequence after ordering. Therefore, without loss of generality, a character can be seen as being part of the UCS. In consequence, the 2nd paragraph except the last sentence should be removed and the 3rd paragraph can be reformulated accordingly, i.e. it can refer to the private-zone UCS coding without further preconditions.

SE: agree mostly (mapping back from the UCS not needed, just keep the original for later retrieval).

Requirements: 6.1.1</CommentOn>

Clarify 1st sentence of the 2nd paragraph. Recommendation: `<recom>`At minimum, the preparation shall guarantee that either only precomposed characters or only combining sequences, which in the context of the conformant application are deemed equivalent, are presented to the comparison method ...`</recom>`

Requirements: 6.2.2.1

This section is not explained in necessary detail and clarity. Concepts like `<em>stacks</em>` are suddenly implied ("stacking of the token will be done"), push and pop operations appear. None of these operations have been

referred to before nor are they explicitly used thereafter.

Technically, the algorithm which the editor obviously has in mind, is, of course, correct. It should, however, be elaborated in more detail. The reader which the editor should have in mind here is the programmer who knows basic devices, but has never worked on ordering.

SE: agree!!!

Typographically, it is difficult to understand why the three paragraphs in question are printed with indentation.

Requirements: 6.2.2.2

The part from `<em>Generally</em>` to the end should be handled as a note or alternatively as a section (6.2.3) of its own.

SE: agree, but it would be better to put it earlier

Level\_3: The topic of `#/+variant character shapes#/-` ("modified letters") must be dealt with on level\_2 to ensure maximal compatibility with pan-European requirements. It has no conceptual likeness to "case" and is not normally used on level\_3 (cf. also the tailoring of Informative Annex\_B.1).

SE: it is unclear what DE means by "variant character shapes" here; things like ETH and LETTER AE are now distinguished at level 1, while font and width changes are handled at level 3.

Distinguishing font and width differences earlier than level 3 is not acceptable. Distinguishing them later than level 3 would not be acceptable to most NBS (or implementers) involved.

Distinguishing ETH from D (and the like) at level 2 rather than level 1; well I'm not sure...

Requirements: 6.3.2

Make all text of the explanatory [I.e....]-statements into notes to stress their informative character or consider other means to achieve that end. Such a solution might be to add an informative annex that explains these and other points which concern the syntax of the CTT.

SE: This rules sections are so tangled that I haven't reviewed them properly yet. Going for XML would simplify a lot, making some rules not needed, and some other should be reformulated and simplified. Having them as is will just scare people off!

Requirements: 6.3 and WF1

`<tt>hex^_symbol</tt>`'s are not defined.

Requirements: 6.3.3, items I4 to I6

The terms `<em>normal form</em>`, `<em>evaluated [weight table]</em>` and `<em>collation-element-weighted</em>` are implicitly defined here, but are used nowhere else. Either the definitions are considered to be of sufficient importance to be included in the "Definitions"-section proper or they should be removed altogether. In part, they can also be incorporated in the specifications themselves, as they explain some requirements more concisely than the corresponding specification itself.

Requirements: 6.4

Remove 2nd sentence of 1st paragraph.

Annex\_B.2

Align the presentation of the delta with that of Annex\_B.1 (as it stands the presentation is not conformant to 6.4) and remove all references to the mnemonics which are altogether irrelevant in this context.

## Annex\_C (general)

Add a remark on the importance of higher level protocols (e.g. markup system SGML) for correct evaluation of numerals and other prehandling objects (e.g. units -- keys -- in a phone book). `<em>Context</em>` rarely suffices to achieve anything like `#/+total certainty#/`. Many of the tasks are quite trivial if we assume an internal tagging like `<TemperatureInC^>-9^</TemperatureInC^>` (cf. C.2.4), but bordering on the impossible to solve reliably without them (In C.2.4 the word `<em>Temperature:</em>` can be regarded as an implicit tag, but most texts are not nearly that schematic as the examples in this annex assume).

SE: well, street names with numbers, version numbering, numeric tabular data where one does not want to convert the numerals to some other number representation (for loss of accuracy) before collation

It is to be considered if Annex\_C really needs to be quite as detailed and extensive as it currently is.

SE: I'd like to keep it essentially as is...  
EXCEPT that C.3 should be deleted!

## Annex\_C.1, 1st dash (minor)

Why are the names of the strings in capitals?

## Annex\_C.1, 2nd dash (minor)

The example text is somewhat obscure (e.g. the remark "according to noble origin or not" presupposes knowledge that this is of importance when ordering).

## Annex\_C.2

The text needs to be clarified to some extent (e.g. what are "Run-together numerals"?).

SE: e.g. part numbers; 94051, 94 might be a category number (or year number) and 051 a sequence number within that category, but there is no punctuation between them.

## Annex\_C.2.2

A cautionary note should be added to stress that these preparatory steps have in some cases (e.g. ordering of telephone numbers in phone books) undesirable consequences and should then be avoided.

## Annex C.2.3, 3rd paragraph

The 2nd sentence ought to be modified. "total certainty" can rarely be achieved even with information on the context.

SE: agree (that was the editor's addition, not mine!)

## Annex\_D, item V.2

Change the formulation of the last sentence of the 1st paragraph. German dictionaries usually employ the German norm DIN\_5007. Some dictionaries explicitly refer to this norm, others simply use it without further clarification, still others explain their ordering principles in some detail.

## Annex\_D, item V.3

Remove phrase `<em>for the first time</em>` in the fourth paragraph.

## Anenx\_D, item VII

Remove this item.

Comments on Annex\_A: Common Template Table</H1>

General: Names of internal symbols

Either reduce all names to a maximum of five letters for consistency or (preferably) give less cryptic names to all of them (e.g. `<tt>^<MACRON^></tt>` instead of `<tt>^<MACRO^></tt>` and `<tt>^<DOUBLE^_TILDE^></tt>` instead of `<tt>^<D0360^></tt>`). Names should best be derived from their description in the UCS.

SE: agree

Variant letter shapes

As mentioned above, variant letter shapes must be distinguished on level\_2 instead of level\_3. Letters such as `<tt>F WITH HOOK</tt>` (`<tt>^<U0192^></tt>`) should best be treated as second level letters. Ideally, only a-z and thorn should be treated as first level letters, though Germany sees this last statement as a strong suggestion for discussion.

SE: See above.

Relative order of scripts (point of discussion)

It is seriously to be considered if the relative order of scripts should not follow a general East-to-West scheme as proposed by the last UK comments. This could easily be achieved by "internal tailoring" the CTT as already done for the special characters of CAN/CSA\_Z243.4.1-1998. Germany sees this, however, only as a strong suggestion for an internal discussion in WG20.

SE: 'internal tailoring' as per "reorder-after" statements is not acceptable (at all).

It would be acceptable to have separate level 1 weight name sequences for different scripts, e.g.:

```
<base-1-weights name-prefix="S" start="295" end="6C4"
cmt="[Symbols and ]plus and minus sign"/>
```

```
<base-1-weights name-prefix="N" start="6C5" end="6CE" cmt="Digits
0-9 in various alphabets"/>
```

```
<base-1-weights name-prefix="La" start="6CF" end="..." cmt="Latin
letters and IPA"/>
```

```
<base-1-weights name-prefix="Gr" start="..." end="..." cmt="Greek
letters"/>
```

```
<base-1-weights name-prefix="Cy" start="..." end="..."
cmt="Cyrillic letters"/>
```

```
<base-1-weights name-prefix="..." start="..." end="..." cmt="and
so on"/>
```

```
<base-1-weights name-prefix="HJ" start="..." end="FFD" cmt="Hangul
Jamo"/>
```

```
<base-1-weights name-prefix="Han" start="4E00" end="9FA5"
cmt="Symbols for Hàn in the BMP"/>
```

```
<base-1-weight-ext name="HANCOMP" value="9FD0" cmt="Level 1 base
weight for 12 misc. compatibility Hàn."/>
```

```
<modif-1-weights basis="HANCOMP" name-prefix="MX" start="2"
end="D" cmt="Modifier weights for 12 misc. Hàn in the BMP; only to
follow HANCOMP"/>
```

```
<base-1-weight-ext name="HANEXTA" value="9FD1" cmt="Level 1 base
```

```
weight for Hàn ext A."/>
<modif-1-weights basis="HANEXTA" name-prefix="MA" start="002"
end="FFF" cmt="Modifier weights for Hàn ext. A in the BMP; only to
follow HANEXTA"/>

<base-1-weight-ext name="HANPLN2" value="9FD2" cmt="Level 1 base
weight for Hàn in plane 2."/>
<modif-1-weights basis="HANPLN2" name-prefix="MB" start="0002"
end="FFFF" cmt="Modifier weights for Hàn in Plane 2; only to
follow HANPLN2"/>
```

This makes the scripts relatively easy to reorder by tailoring, without being too cryptic.

Script: Greek

Maximum compatibility with the specifications of ELOT as presented in WG20/NXXXX is to be sought. To achieve this the breathing marks Psili and Dasia should precede the other diacritics. This is also in line with usual Greek (cf. the study CEN/TC304/Nyyy. <tt>COMBINING COMMA ABOVE</tt> and >tt>COMBINING REVERSED COMMA ABOVE</tt> (with which Psili and Dasia are -- unwisely -- unified in the UCS) are diacritics which appear infrequently in languages other than Greek, whereas in Greek they are very frequent indeed. Cf. also the approach of the E.

SE: agree

Script: Cyrillic

The order for Cyrillic is not in line with pan-Cyrillic requirements and contains numerous errors. The sequence must be brought in line with the specifications from GOST as reflected in the current edition of the European Ordering Rules (cf. EOR). Detailed documentation both from GOST itself and from other sources will be made available to WG20 before the May meeting.

SE: the motivations for this is not sufficiently well-argued as yet. (someone referring to their Yudit config file (N662) does not count! References to well-known dictionaries do.)

Script: Georgian

The ordering of Georgian should be coordinated with the results of ongoing discussion with experts in the field both from Georgia itself and in academic organizations.

\_\_\_\_\_ end of Germany comments;

**beginning of Ireland comments \_\_\_\_\_**

Irish comments on FCD ISO 14651  
 Reference: SC22 N2844  
 Closes: 1999-04-08  
 Date: 1999-04-08

Although Ireland voted positively on the draft on 1998-01-26, we now wish, because of subsequent review of the document, to reverse our position. Ireland votes No on the FCD draft.

Many of our our objections are editorial in nature, and we believe that our No vote can be turned back to Yes easily if the following points are addressed appropriately by SC22/WG20:

- 1 The English text must be revised so that it is in all cases unambiguous and grammatically correct.
- 2 Informative text in the Common Template must be revised so that the implication is not made that French backwards-ordering of accents is not a special case.
- 3 The assertion that small letters ordered before capital letters is the normal practice for the English language is not made and is removed from informative annex D.
- 4 The Canadian and Danish example benchmarks must provide enough examples to interpret the specifications from which they are derived.
- 5 The Common Template should contain orderings for all Amendments to 10646 up to Amendment 31, not up to Amendment 7. Ogham, Cherokee, and Runic are already in order (except for the Ogham and Runic punctuation); Canadian Syllabics will require some work to get it right.

1. We have remarked on earlier drafts of this International Standard that the use of the English language is in many cases either ambiguous or grammatically incorrect. We had offered to prepare a corrected version, but because text was not provided to us in time before the last meeting WG20, we were forced to withdraw our offer of making the corrections. We offer now again to provide a new version with document revision annotations. We feel strongly about this because in reviewing the draft, we were often forced to stop and read aloud certain passages in order to decipher the intended meaning. Examples of grammatically incorrect or ambiguous sentences:

- 1 It is demonstrated that by tailoring the Common Template Table to add extra token values at level 2 for all precomposed characters affected by a diacritics diacritic, it is possible to accomplish identical results for combining sequences without requiring that preparation.
- 2 The scanning properties for the level *i* being processed needs to be carefully monitored. When there is a change in scanning direction at level *i* (this implies implying that the character being processed comes from a block that which is different from the preceding character processed and which has different scanning properties) and the new direction is backward, stacking of the token will be done at the position where the change of direction has occurred.
- 3 If the `order_start_entry` does not uses use the position value at level *m* of a block (the position value is explicitly used in the template for the only block defined) then the formation of subkey level *m* is done in exactly the same way as the above-defined

- formation.
- 4 WF7. No two `section_definition_entryOs` instances of `section_definition_entry` in a `tailored_table` may contain the same values in their `section_identifierOs` instances of `section_identifier`. [I.e. That is, multiple definition of `sectionOs` is prohibited; `section_identifierOs` instances of `section_identifier` must be unique.]
- 5 [I.e., That is, if one takes two strings, builds keys for each based on table 1 and compares them, one should always get the same results as when one builds keys for them based on table 2 and compare compares them.]
- 6 In cases where the applications an application has provision to allow the end-user to tailor the table himself or herself, any statement of conformance shall indicate which ones of the 4 elements of the previous list are tailorable and which ones are not tailorable.
- 7 Whenever the Common Template Table is referred externally as a starting point in a given context, either applicative or contractual [WHATDOESTHISMEAN??], it shall be referenced using the name `ISO14651_1999_TABLE1`.
- 8 For very big large, or very tiny small, values, one often uses formats like  $2.5 \times 10^7$  (to just pick one possible way of writing these for the purposes of the examples here).
- 9 But the Common Template Table has digits as specifies digits to be level 1 significant.
- 10 Such processing is beyond the scope of this International Standard, though however.
- 11 A public-domain public-domain reduction technique is described in details detail (with ample numerous examples) in *Technique de r duction - Tris informatiques ^ quatre cl s*, Alain LaBont , Minist re des Communications du Qu bec, June 1989 1989-06 (ISBN 2-550-19965-0).
- 12 To illustrate this (without discussing context analysis which is not necessary in what follows), examples of dictionary sequences are given here for two languages which whose native order is not in the Common Template table:

## 2. The Common Template states:

```
% To tailor for French accent handling, or not to make French
% a special case add an order_start statement
% and order_end for Latin in the Latin section, as follows:
```

```
% order_start Latin;forward;backward;forward;forward,position
```

In Ireland we consider French to be a special case, which in fact yields incorrect sorting for our first official language, and we disagree with the implication here, namely, that Onot making French a special case0 does no harm. French is a special case of the default template, just as Danish and Swedish are. The Common Template must read:

```
% To tailor for French accent handling, add an
% order_start statement and order_end for Latin
% in the Latin section, as follows:
```

```
% order_start Latin;forward;backward;forward;forward,position
```

## 3. Annex D states:

### 3. The third decomposition breaks ties for quasi-homographs different

only because upper-case and lower-case characters are used. This time, the tradition is well established in English and German dictionaries, where lower case always precedes upper case in homographs, while the tradition is not well established in French dictionaries, which generally use only accented capital letters for common word entries. In known French dictionaries where upper and lower case letters are mixed, the capitals generally come first, but this is not an established and stated rule, because there are numerous exceptions.

This is, as we have said many times to SC22/WG20, incorrect. Lower case does not precede upper case in English. The concise Oxford dictionary of current English, cited in the JTCL and CEN directives as a standard for the English language, consistently gives, in its 8th edition (1990) and its 9th edition (1998) the following:

August (month)	May (month)
august (venerable)	may (be able)
March (month)	Polish (of Poland)
march (tread)	polish (shine)
Mass (ritual)	
mass (heap)	

So for a Common Template it is advisable to use English and German traditions, if one wants to group the largest possible number of languages together.

This rationale is therefore unacceptable, as it is untrue. The reason the Common Template has smalls before capitals (which we do not prefer) is because that is what is specified in the Unicode template. This text must be revised.

Let's note here by the way that in Denmark, upper case comes before lower case, a different but well established rule. This is a second fact calling for adaptability in the model used in this standard.

This same rule is used for the English language.

Example: to have the following order: "august", "August", numbers could be assigned indicating respectively "l11111", "u11111", where "l" means lower case and "u" upper case.

This example is not sufficient. The actual syntax for ordering smalls before caps which appears in the Common Template should be repeated here, along with the actual syntax for ordering caps before smalls.

SE: By all means, order capitals before "smalls" by default.

IN ANY CASE, there should be only two named weights whose weight values should be swapped to **consistently** get it the other way around. NOT as in the balloted table, where a handful of weights needs adjustment for such a swap. See N641 on how to achieve this!

4. The Canadian delta specifies treatment of THORN and ETH but the benchmark does not contain examples containing these characters. Please add: <sup>a</sup>orsmsrk, Thorvardur, <sup>a</sup>orvarñur, medal, meñal. The Danish benchmark examples of REE and RÿE are not sufficient to demonstrate E vs. ÿ. Please add more examples as well as examples of such as Ree and R e.

5. The draft is a bit overloaded with references to English, French, and German. A few more examples from other languages would be preferred.

SE: agree

\_\_\_\_\_ end of Ireland comments;

**beginning of Japan comments \_\_\_\_\_**

From haruhana@itscj.ipsj.or.jp Thu Apr 8 11:42:58 1999

Subject: Japan's vote on SC22N2844

Comments on FCD 14651.2

The National Body of Japan disapproves FCD 14651.2 for the reasons below.

If the comments are satisfactorily resolved, Japan will change its vote to approval.

J.1) Global:

This draft contains many errors and is too difficult to understand because it throws away a great deal of the material developed in FCD 14651.1 and the LC\_COLLATE section in FCD 14652.1.

Japan agreed to make FCD 14651.2 independent of 14652 assuming that the well discussed and sophisticated part of 14652 would be imported in the second FCD thus enabling us to review it as FCD. But the current draft is far from that. We request to put it back to a mixture of FCD 14651.1 and the LC\_COLLATE section in FCD 14652.1 which have been studied by many people. If our request is rejected, the project should be put back to the CD stage.

SE: Agree on that better explanations are needed. We do not agree that 14652 is the right place to look for this.

J.2) Global:

There are many inconsistencies about tailoring and "delta". Japan considers that the following principles should be reconfirmed in the FCD disposition before any other detailed discussion:

a) The Common Template Table (CTT, hereafter) is not a table to be used by the ordering method -- the CTT always needs tailoring.

SE: this does not say much, since a tailoring may be empty.

b) Tailoring is always described as a delta to CTT.

c) The tailored table is a result of applying a delta to CTT,

d) The tailored table is a table assumed in the reference method description.

SE: the reference method should refer to the collation items and their weight strings as seen via the tailoring used.

J.3) p.iv, Introduction, the first sentence:

The sentence

This International Standard provides a method for ordering text data worldwide, and provides a Common Template Table whose tailoring eases adaptation of a specific script

while retaining universal properties for other scripts

should be changed to

This International Standard provides a method for ordering text data worldwide, and provides a Common Template Table whose tailoring eases adaptation for culturally specific handling of some scripts with minimal efforts.

because tailoring of the Common Template Table usually deals with two or more scripts and the wording "universal properties for other scripts" may be interpreted as if there were an universally accepted set of collating properties for each script.

SE: agree

J.4) p.1, 1 Scope, bullet 1:

In the first bullet

- A simple method of reference for comparing two characters strings in order to determine their respective order in a sorted list. The method is applicable on strings that exploit the full repertoire of ISO/IEC 10646 (independently of coding).

"10646" should be changed to "10646-1" because the syntax "Uxxxx" allows only to refer to BMP.

J.5) p.1, 1 Scope, bullet 1:

The sentence

This method uses transformation tables derived from either the Common Template Table defined in this International Standard or from one of its tailorings.

should be changed to

This method uses transformation tables derived from table specifications tailored from the Common Template Table defined in this International Standard.

because the Common Template Table without tailoring should not be used as a source of transformation tables.

J.6) p.1, 1 Scope, bullet 4:

p.11, 6.5 Name of the Common Template Table:

The fourth bullet in the scope and the subclause 6.5 should be removed because defining the reference name for Common Template Tables is not a matter of this standard but a matter of the referencing systems.

SE: agree

NOTE) The addition of the reference name does not depend on the NB comments to the first FCD.

J.7) p.1, 1 Scope:

Add a bullet

- Requirements for a declaration of the differences between the comparison table used in applications and the Common Template Table,

in order to cover the contents of subclause 6.4.

SE: agree

J.8) p.2, 2. Conformance:

An application is not appropriate as a target for defining conformance. We propose to define the conformance of "a text data", "an ordering service with built-in table", and "an ordering service without built-in table" as follows:

#### 2 Conformance

The order of a text data according to a declared tailored table is conforming to this International Standard if the text data coincides with the output of the referenced method prescribed in clause 6. with some input data and the tailored table input.

An ordering service with a built-in and declared tailored table is conforming to this International Standard if the order of each output for an input data according to the built-in tailored table is conforming to this International Standard.

An ordering service without built-in table is conforming to this International Standard if the order of each output data for a pair of an input data and a declared tailored table is conforming to this International Standard.

SE: seems ok

J.9) p.2, 2 Conformance:

NOTE: This comment needs not be considered if the comment J.8 is accepted.

The sentence

More specifically, it is the responsibility of implementers to show how their delta declaration is related to the table syntax described in clause 6.3, and how the comparison method they use.

should be simplified to

More specifically, it is the responsibility of implementers to show how their delta declaration is related to the table syntax described in clause 6.3.

because the phrase "how the comparison method they use" is not grammatically correct and implementers need not to make open their inner mechanisms if only their outputs are conforming.

J.10 p.2, 2 Conformance:

NOTE: This comment needs not be considered if the comment J.8 is accepted.

The sentence

Any declaration of conformity to this International Standard shall be accompanied by a declaration of the tailoring delta described in clause 6.4 in case tailoring is not provided by the concerned application

should be changed to

Any declaration of conformity to this International Standard shall be accompanied with a declaration of the tailoring delta described in clause 6.4

because the Common Template Table will not be in work without tailoring.

If this request is rejected, the words "in case" in this sentence should be replaced by the word "unless".

J.11) p.2, 2. Conformance, 2nd para.:

NOTE: This comment needs not be considered if the comment J.8 is accepted.

The last sentence, which lacks the subject, should be removed because it is covered by the first sentence of this clause.

J.12) p.3, 4.7 "glyph", 4.8 "graphic character":

The second sentence in 4.8 "graphic character" should be removed because its meaning is already introduced in the first sentence by "that has a visual representation ..."

The definition 4.7 "glyph" should be removed because it is used only in 4.8 thus the first part of the following UK comment on the first FCD

A definition of "glyph" is required (Clause 4 para 3) if this term is to be used. Alternatively, the use of the term "graphic symbol" (as in ISO/IEC 10646, section 4.19) may be preferable.

becomes meaningless now.

J.13) p.4, 6.1.1 Preparation of character strings:

This subclause 6.1.1 should be put out of the subclause 6.1 (say the new clause 7) because the subclause 6.1.1 discusses about the outside of the reference method.

J.14) p.4-7, 6.2 Building the ordering key used in the reference comparison method:

Although there are descriptions for building subkeys, there is no description for building a numeric key to be used in 6.1.

Japan considers that the drastic change of the algorithm from the first FCD produced many fatal deficiencies.

Japan recommends to put back the whole content as a merge of FCD 14651.1 and the related part of CD 14652.

SE: the reference method needs to be described better, but 14652 is not the place to look for it.

J.15) p.7, 6.3 Common Template Table: formation and interpretation:

The relation between the syntax defined here and the semantics in the previous subclause is too poor as a standard and this subclause 6.3 contains many errors in itself. See the detailed comments below.

J.15-1, Global) The production rules should be presented in a top-down manner.

SE: no, an XML format (via a DTD) should be used instead

J.15-2, Global) The names of the terms should be exactly the same as are used in other places e.g. the name "untailed\_template\_table" in Rule 46 should be changed to "common\_template\_table".

J.15-3, Rule 44) The two lines in CTT

```
section CANSpecials
```

and

```
reorder-section-after CANSpecial <U001F>
```

are illegal according to the BNF. They should be changed as simple\_line's or they should be removed from CTT.

SE: they should be removed, and the entire level 4 needs to be reworked completely. (See the Swedish comments.)

J.15-4, Rule 24, 20) The multiple symbol weight definition in CTT such as

```
<U4E00>..<U9FA5> <S4E00>..<S9FA5>;<BLANK>;<MIN>;<U4E00>..<U9FA5>
```

is illegal according to the BNF. The production rules should be supplied

SE: see N639, or better:

```
<!ELEMENT cils EMPTY>
<!ATTLIST cils
    mtc-start    NMTOKEN    #REQUIRED
    mtc-end      NMTOKEN    #REQUIRED
    v1-start     NMTOKENS   #REQUIRED
    v1-end       NMTOKENS   #REQUIRED
    v2           NMTOKENS   #IMPLIED
    v3           NMTOKENS   #IMPLIED
    v4           NMTOKENS   #IMPLIED
    cmt         CDATA      "A range of level 1 significant"
```

collation items; note that multiple weights can be generated at each level, to allow for Hangul syllables"

>

J.15-5, Rule 24) "line\_completion" should be removed.

J.15-6, Rule 14, 13, 12, 11, 5, 6) From the current definitions, all the ucs\_symbols are recognized also as simple symbols.

J.15-7, Rule 41, 40) The lines consisting of "line\_completion" only are recognized as "simple\_line" and "tailoring\_line".

SE: many (not all) of these issues (below) would simply disappear as issues if we use an XML DTD instead!

J.15-8, Rule 38) Remove the second appearance of "space" in order to match with CTT.

J.15-9, Rule 38) There is no explanation throughout this document for the use of "identifier" here.

J.15-10, Rule 28) "line\_completion" should be removed.

J.15-11, Rule 29) "line\_completion" should be removed.

J.15-12, Global) The functionality which is supported by "collating-element" should be supported as a tailoring line.

J.15-13, Rule 1, 10) Make clear that "line\_delimiter" is not included in "character".

J.15-14, Rule 43) This production rule should be removed because it is not referenced.

J.15-15, WF1) This condition should be modified to

WF1. Any "simple\_symbol" occurring in a "multiple\_level\_token" must be defined in a "symbol\_definition" line in the table.

because there may be a "symbol\_weight\_entry" such as

```
<a>      <a1>;<a2>;<a3>;<a4>
```

where <a1>, <a2>, <a3>, or <a4> needs to be greater than <a>.

J.15-16, WF1) The term "hex\_symbol" does not appear in BNF. It should be changed to "ucs\_symbol".

J.15-17, WF2) This condition should be replaced by an explanation

An empty `level_token` shall be interpreted as the collating element itself.

in the same way as POSIX because the current condition prohibits defining a collation which needs more than four levels.

If this proposal is rejected, the sentence

All `multiple_level_token`'s in a `tailored_table` must contain the same number of `delimited_level_token`'s

should be changed to

All `multiple_level_token`'s in a `tailored_table` in a normal form (see I4 later) must contain the same number of `delimited_level_token`'s

J.15-18, I1) The text should be changed as follows:

I1. There are two types of sections.

One type, "simple definition", consists of the list of `simple_line`'s

following a `section_definition_simple_entry` in a `tailored_table`.

Another type, "list definition", is defined by a `section_definition_list_entry`. It is equivalent to a "simple definition" consisting of a list of `symbol_definition` lines which are regarded as an expansion of the `symbol_list`.

Example)

section FOO <ABC>;<DEF>;<GHI>

is equivalent to

section  
<ABC>  
<DEF>  
<GHI>  
(non simple line)

J.15-19, I2, I3) Usage of the word "same" here is confusing.

J.15-20, I2, I3, I4)

The explanations for tailoring here need some improvements because applying a number of operation sequentially causes a problem of their order and side-effects.

For example, when a symbol `<Uxxxx>` in CTT is redefined by a "reorder-after" directive and the symbol is a target symbol in a successive operation, it is not clear which position, old one's or new one's, is preferred.

J.15-21, I5) It should be explained how to deal with multiple occurrences of a symbol to be evaluated -- e.g. only the last one should be valid.

J.15-21, I6) The term "hex\_symbol" does not appear in BNF.

J.15-22, I6) The sentence

All hex\_symbol's are assumed to map to an integral weight value equal to that hex\_symbol interpreted as a hexadecimal number

is a source of problems. The term "hex\_symbol" does not appear in BNF. If hex\_symbol's are equivalent to ucs\_symbol's or ones like <S0200> in CTT, the sentence is wrong because ucs\_symbol's and ones like <S0200> should be numbered in the sequence of table lines along with simple\_symbol's and their numbers have no relation with the hexadecimal values except the incremental nature in each range specification.

J.15-23, I6) The sentence

All hex\_symbol's (ucs\_symbol in our understanding!) are assumed to map to an integral weight value equal to that hex\_symbol interpreted as a hexadecimal number

is wrong, because ucs\_symbol's should be mapped to an integral also in the sequence of table lines along with simple\_symbol's and the values have no relation with the hexadecimal values.

J.15-24, Rule 19) CTT includes many lines which have two or more "space"s immediately before "comment". They should be modified or the BNF should be modified.

J.15-25, Rule 5, 11) CTT includes illegal identifiers such as

<2AIGU> % COMBINING DOUBLE ACUTE ACCENT  
<2GRAV> % COMBINING DOUBLE GRAVE ACCENT

They should be modified or the BNF should be modified.

J.15-26, Rule 21 and other places) The Rule 21 allows an expression like

<ABC>..<<XYZER>

It should be clarified in syntax or in well-formedness or in interpretation what are allowed for "symbol\_list\_item\_range" and how they are interpreted.

J.16) p.10-, 6.4 Declaration of delta, 1st sentence:

The first sentence

It is recommended that tailoring be done starting with the

Common Template table described in annex A.

is wrong because all the tailoring shall start from the Common Template Table.

If this standard allows to define some collating specification from the scratch, there are many places to be changed.

J.17) p.17, Annex B.2, Example 2 - Danish delta and benchmark:

This is a wrong example because it contains no valid `order_start` entry and it contains some illegal lines starting from "collating-element".

J.18) p.10, 6.4 Declaration of a delta:  
p.12, Annex A Common Template Table:

Two of the three toggling switch, which was the major achievements until the first FCD and got no NB comment to remove them, are omitted in this draft.

It should be revived in 6.4 and Annex A.

SE: no, tailorings should deal with this by other means; see e.g. N639 and N640. Remember that the format specified in 14651 is normative for annex A only. It has nothing to do with POSIX, and that would be much clearer if an XML format is used instead!

J.19) Global:

The word "conformant" should be replaced with the word "conforming".

\_\_\_\_\_ **end of Japan comments;**



place has introduced many new ambiguities.  
Below we will first give some general remarks and then some remarks related to the paragraphs in the document.

General remark 1:

There are still quite a few sentences in the document that are clearly not written in proper English. This makes the document difficult to understand.

General remark 2:

There are quite a few occurrences of words that do not belong in an IS. We mention just a few: minimum of efforts, fundamental choices, highly recommended, straightforward, challenge, simple, a lot of, excellent, carefully.

SE: agree

General remark 3:

The precision of definitions and wording still leaves much to be desired. Some of the detailed issues below are consequences of the textual ambiguities in the document.

SE: agree

Detailed remarks:

Re Introduction:

There is still confusion about the precise meaning (or difference in meaning) of 'ordering', 'collation' and 'comparison'.

The example of 'English as a poor exception' sounds negative and is unintelligible.

Re 1 Scope:

Is 'a method of reference for comparing two character strings' (first dash) the same as 'the comparison method' (third dash)?

....any equivalent method giving the same results is acceptable.

Are there equivalent methods giving different results?

Are there non-equivalent methods giving the same results?

Re 2 Conformance:

section => clause

paragraph 2: crippled English

Re 3 Normative References:

8859 and 14652 are missing.

SE: NO, NEITHER OF THESE ARE TO BE REFERRED TO NORMATIVELY!!

Re 4 Definitions:

The notions of 'object', 'element', 'comparison element' and 'internally' have not been clarified.

4.10 discusses 'the reference comparison method'. Is this the same as 'a method of reference' in clause 1?

4.11 states that ordering affects two SETS OF strings, whereas clause 1 states that ordering affects TWO STRINGS.

Re 6 Requirements:

6.1 states 'Reference method' whereas 6.1.1 states 'comparison method'  
Are these the same?

Although not part of the scope of this IS, .....  
It is unclear whether this part is normative or not.  
If this part is not normative, requirements as presented under 6.1.1  
should be moved to an informative annex.

....described in 6.1....  
This is unclear as this is clause 6.1.

...are meant to be equivalent.  
The notion of equivalent is unclear.

6.1.2 .....the algorithm of key formation described in clause 6.2 ...  
6.2 does not describe 'key formation'; 6.2.2 describes 'key composition';  
has that been intended?

6.2.1.1  
We have here 'ordering table', 'transformation table' and  
'matrix of n lines'. None of these notions is particularly clear;  
in particular the last one is quite ambiguous.  
It seems only one notion would be sufficient.  
For a precise notion, WG20 is referred to the notion  
of 'map' as used in VDM-SL.

SE: I don't think we should start using VDM.

6.2.1.2  
...A tailored table may be separated into blocks.  
This seems to imply that a non-tailored table may not be separated  
into blocks. This seems odd.  
'May' is not allowed in an IS.  
The notion of a block is unclear. Is a diagonal sub-matrix a proper block?

6.2.1.2 Note:  
The notions of 'logical sequence', 'presentation sequence' and 'logical  
order of the presentation forms(?)' are unclear.

6.2.2 Key composition:  
The notion of 'comparison field' is unclear.  
The notion of 'successive sequence' is unclear.

The whole issue of 'stacking a token' and 'push position' is unclear.  
As far as understandable, the stack seems never to be popped; the use of  
the values in the stack stays unclear.

The discussion under 'Level 4' is incomprehensible.  
Additionally, it is unclear what differentiates 'logical string sequence'  
from 'logical sequence'.

6.3.1 BNF Syntax Rules:

This is NOT BNF; it is not EBNF either, but a local variation.  
Why not use the SC22 document available?

SE: use an XML DTD instead (or SGML DTD; SGML is an ISO standard)

There are various kinds of quotes in this table.

I5. .... order in this file.

It is unclear which file is used here.

It would have been most helpful when the notion of a block as introduced in clause 6.2.1.1 would have been present in the BNF.

The notions of combining character and precomposed character have not been defined.

#### 6.3.4

C1. (full stop missing)

C1. Two collation weighting tables...

What on earth are these?

... is exactly matched by ...

What is the difference between

'exactly matched', 'exactly equal' and 'equal'?

#### 6.4 Declaration of a delta:

...14652, which uses a syntax that is compatible with the one described in this IS.

Why having two partially overlapping standards?

SE: leave 14652 entirely out of 14651. 14652 needs a total rework anyway, if continued

...that occur in the comparison table used relatively to the Common Template Table if a fixed table is ...

The number of tables gets (relatively) overwhelming.

....as defined in 6.2.1 => 6.3.1 (two times)

Re Note:

It is unclear why two imprecise forms are allowed here when a precise one is available also.

Re Annex A:

It is unclear what a 'common template' is.

Re Annex B:

It seems the lines containing

```
order_start TABLE;forward;backward;forward;forward,position
```

cannot be derived from the BNF.

It seems the line

```
copy ISO14651_1999_TABLE1
```

cannot be derived from the BNF.

It seems the lines containing sequences of <U....> cannot be derived from the BNF as line 15 of the BNF requires double quotes.

There are some formatting problems here.

\_\_\_\_\_ **end of Netherlands comments** \_\_\_\_\_

Secretariat Note: The Sweden comments are contained in document SC22  
N2912.

---

**beginning of UK comments**

---

UK comments on ISO/IEC FCD 14651

The UK votes Yes with comments

- UK comments GB(a)-GB(b) refer to editorial issues in sections 1-6;
- UK comments GB(c) refers to a technical issue:
- UK comments GB1-GB8 refer to details of the default table in section 7.

General: the UK notes that Michael Everson (NSAI, Ireland) had volunteered to ISO/IEC JTC1/SC22/WG20 to undertake the task of improving the English text, and hopes he will be able to continue that task.

UK comments GB(a)-GB(b) are intended to assist him in that task.

-----  
 GB(a) Editorial (mainly English problems)  
 -----

1. Scope para starting "Specific symbols" insert "for" after "except"

4.8 Second sentence replace "To a" with "A"

5. Second para second sentence delete "ever"

6.1.1 Note 1 replace "It is demonstrated" by "It can be demonstrated";  
 "not typically" by "typically not" and "required" by necessary"

6.2.1.2 Note para 4 replace "to code Arabic completely" with "the complete coding of Arabic"

-----  
 GB(b) Editorial (mainly English problems, but without a recommended solution since the meaning of the original text isn't clear  
 -----

5. Second para second sentence the usage of "all the coded graphic characters"

6.1.1 Note 1 "economy of means in the general case" isn't right

6.1.1 Note 2 "constitute very sensitive to interpret" isn't the correct English phrase, perhaps "are context sensitive data"?

6.2.1.1 "in a special way according to what is described in what follows"??

6.2.1.1 Note para 4 "presentation forms be coded in" is unclear

6.2.2.2 Level 4 "common to all scripts or the level not specifically belonging to any script"??

6.2.2.2 Level 4 para 3 It is not clear what the subject "these characters" actually is.

-----  
 GB(c) Technical  
 -----

BNF Syntax Rules should be those of the approved IS and this should be included in the References Clause 3

SE: the IS being that for SGML!!!

-----  
 GB1. Cyrillic letters used in Old Church Slavonic and Macedonian:  
 -----

Prefer altering position of character DZE, so it follows in the order ZHE, DZE, Z. Rationale:

If the default order uses that, it provides for old Church Slavonic (with a considerable literature, over many centuries) without any tailoring being required.

The current order involving DZE provides only for Macedonian, which was established as a literary language during WWII (BGN/PCGN information).

It is Macedonian which should use a tailoring here, as tailoring is very likely for Macedonian anyway, due to the interchange of glyphs G\_acute and K\_acute for DJE and TSHE respectively, but retaining the underlying Serbian order despite the glyph change.

BGN/PCGN also has the order Zhe, z, dze - a further variant ordering for Macedonian.

So the more stable Old Church Slavonic order should be adopted as the default order.

-----  
 GB2. Greek  
 -----

<U0342 IGNORE; <PERIS; <MIN; <U0342 % COMBINING GREEK PERISPOMENI should be filed following <U0303 IGNORE; <TILDE; <MIN; <U0303 % COMBINING TILDE  
 The tone mark PERISPOMENI is mis-ordered on most occasions in both ISO/IEC FCD 14651 and the Unicode Ordering Algorithm. It should follow other tone marks, not breathing marks.

Here is an example.

```
<U1FBD IGNORE; IGNORE; IGNORE; <U1FBD % GREEK KORONIS
<U1FBF IGNORE; IGNORE; IGNORE; <U1FBF % GREEK PSILI
<U1FC0 IGNORE; IGNORE; IGNORE; <U1FC0 % GREEK PERISPOMENI
<U1FC1 IGNORE; IGNORE; IGNORE; <U1FC1 % GREEK DIALYTIKA AND PERISPOMENI
<U1FCD IGNORE; IGNORE; IGNORE; <U1FCD % GREEK PSILI AND VARIA
<U1FCE IGNORE; IGNORE; IGNORE; <U1FCE % GREEK PSILI AND OXIA
<U1FCF IGNORE; IGNORE; IGNORE; <U1FCF % GREEK PSILI AND PERISPOMENI
<U1FDD IGNORE; IGNORE; IGNORE; <U1FDD % GREEK DASIA AND VARIA
<U1FDE IGNORE; IGNORE; IGNORE; <U1FDE % GREEK DASIA AND OXIA
<U1FDF IGNORE; IGNORE; IGNORE; <U1FDF % GREEK DASIA AND PERISPOMENI
<U1FED IGNORE; IGNORE; IGNORE; <U1FED % GREEK DIALYTIKA AND VARIA
<U1FEE IGNORE; IGNORE; IGNORE; <U1FEE % GREEK DIALYTIKA AND OXIA
<U1FEF IGNORE; IGNORE; IGNORE; <U1FEF % GREEK VARIA
<U1FFD IGNORE; IGNORE; IGNORE; <U1FFD % GREEK OXIA
```

<U1FFE IGNORE;IGNORE;IGNORE;<U1FFE % GREEK DASIA

ELOT, in correspondence with the European Ordering Rules Project Team, states that letters with tones but no breathing marks should follow letters with breathing marks.

The ISO/IEC FCD 14651 should provide a justification for the current ordering in a comment, or even alter the ordering.

SE: level 4 needs to be reworked completely anyway...

-----  
 GB3. Naming conventions  
 -----

Naming conventions in tables in ISO/IEC FCD 14651, the Unicode Ordering Algorithm SYMDUMP2.TXT and the European Ordering Rules all vary.

The European Ordering Rules are most consistent, fullest, and recognisably English language in description.

For the English language version of ISO/IEC FCD 14651, the full form used in the European Ordering Rules should be used, rather than any abbreviated French language conventions, for ease of use by those using the tables.

SE: agree in principle

EOR: - uses same naming conventions as in ISO/IEC 10646

<U01DF <a;"<DIAERESIS<MACRON";<SMALL;<U01DF % LATIN SMALL  
 LETTER A WITH DIAERESIS AND MACRON

ISO/IEC FCD 14651: - uses differnt naming conventions from ISO/IEC 10646

<U01DF <S6CD;"<TREMA<MACRO";<MIN;<U01DF % LATIN SMALL  
 LETTER A WITH DIAERESIS AND MACRON

Abbreviations are fine, but they should use abbreviations of the first few letters of the name element in ISO/IEC 10646. There should be no ambiguity in doing this, if it is felt necessary for the columns to align.

Column alignment is not required for a machine readable table, and column alignment seems an unnecessary refinement.

SE: it is not aligned now anyway...

-----  
 GB4. Inconsistencies  
 -----

The spacing and non-spacing versions of the same characters (tilde, etc) are filed differently, rather than interfiling. A rationale for this is not given. Ideally they should be the same for consistency.

SE: well, this is a bit intricate. Spacing tilde should be handled as a space followed by a combining tilde. It is just that space is ignored at levels 1-3, so using the level 2 weight for the combining tilde would, collationwise, apply it to the preceding letter, if any. Which is incorrect! So combining characters applied to levels 1-3 ignored items should themselves become levels 1-3 ignored items, and only have a level 4 weight. But we can't use the level 2 weight at level 4 straight off: the number of digits may be different, and one may need to shift the

value a bit so that it does not collide with an existing level 4 weight. See N641, where such shifting information is included.

-----  
 GB5. Ordering of SPACE  
 -----

Regarding ordering of SPACE, in the former versions of ISO/IEC FCD 14651, a toggle was forced, so that the user had to decide one way or the other, by decommenting the relevant field. The draft standard had additional comment fields to assist the user in this.

Now, however, SPACE is treated completely differently in the default tables of ISO/IEC FCD 14651 and the Unicode Ordering Algorithm, but without any comments in either case.

In the former, SPACE is ignored in filing: in the latter it is a blank character. The latter reflects general practice in nearly all existing IT systems, at operating system level and in many applications: that is what should be followed in ISO/IEC FCD 14651, i.e. ISO/IEC FCD 14651 should follow Unicode Ordering Algorithm practice in SYMDUMP2.TXT.

If there are differences between these two standards that are reckoned to be a profile one of the other, there should be a justification, in comment fields, or appropriate text in the body of the standard.

SE: space should by default be ignored at levels 1-3. No toggle should be introduced for tailoring this.

-----  
 GB6. Conventions for describing fields within tables  
 -----

Given that the Unicode Ordering Algorithm, ISO/IEC FCD 14651 and the European Ordering Rules Project Team are supposed to be harmonised, some conventions are unexplained [1] and there are unnecessary and unexplained differences between them [2]:

[14651]	<U0041 <S6CD;<BLANK;<CAP;	<U0041 % LATIN CAPITAL LETTER A
[Unicode]	<U0041 <S6CD;<BLANK;<CAP;	<@0041 % LATIN CAPITAL LETTER A
[EOR]	<U0041 <a;<BLANK;<CAPITAL;	<U0041 % LATIN CAPITAL LETTER A
	[1] (weight)	[2]

SE: the "@-version" is an old version for 14651. The UCA format is completely different, and does not name weights.

These should be explained in each case, somewhere in each standard. The EOR weight is different, rather like the previous version of ISO/IEC FCD 14651.

In ISO/IEC FCD 14651, the records in the default table use <COMPAT etc: compatibility characters are defined in Unicode but not in ISO/IEC FCD 14651 or in ISO/IEC 10646:

Please add appropriate definitions/descriptions here.

-----  
 GB7. Possible errors of ordering in the default table  
 -----

-----  
 This apostrophe should go with other apostrophes:  
 <U055A <S27B;<BLANK;<MIN;<@055A % ARMENIAN APOSTROPHE

There are possible inconsistencies in that some letter-like characters are filed among the letters, others are filed among symbols in a separate sequence, as below (the <S number show that these are all filed as symbols in that <S order: other characters inserted on the left indicate other characters that they might file among, for consistency:

	<U2108 <S2EF;<BLANK;<MIN;<@2108 % SCRUPLE
L B	<U2114 <S2F0;<BLANK;<MIN;<@2114 % L B BAR SYMBOL
P	<U2117 <S2F1;<BLANK;<MIN;<@2117 % SOUND RECORDING COPYRIGHT
	<U211E <S2F2;<BLANK;<MIN;<@211E % PRESCRIPTION TAKE
R	<U211F <S2F3;<BLANK;<MIN;<@211F % RESPONSE
V	<U2123 <S2F4;<BLANK;<MIN;<@2123 % VERSICLE
OZ	<U2125 <S2F5;<BLANK;<MIN;<@2125 % OUNCE SIGN
[Omega]	<U2127 <S2F6;<BLANK;<MIN;<@2127 % INVERTED OHM SIGN
[iota]	<U2129 <S2F7;<BLANK;<MIN;<@2129 % TURNED GREEK SMALL LETTER IOTA
e	<U212E <S2F8;<BLANK;<MIN;<@212E % ESTIMATED SYMBOL
f	<U2132 <S2F9;<BLANK;<MIN;<@2132 % TURNED CAPITAL F

Some of these Latin numbers should go with other alphabetic filing, as indeed other ones do in the main Latin (etc) sequence, e.g.

CD	<U2180 <S2FA;<BLANK;<MIN;<@2180 % ROMAN NUMERAL ONE THOUSAND C D
	<U2181 <S2FB;<BLANK;<MIN;<@2181 % ROMAN NUMERAL FIVE THOUSAND
	<U2182 <S2FC;<BLANK;<MIN;<@2182 % ROMAN NUMERAL TEN THOUSAND

Here are Latin numerals which are mostly in a more predictable filing sequence:

	<U217D <S6F9;<BLANK;<COMPAT;<@217D % SMALL ROMAN NUMERAL ONE HUNDRED
	<U216E <S705;<BLANK;<COMPATCAP;<@216E % ROMAN NUMERAL FIVE HUNDRED
vi	<U2175~<S8C7<S79B" ; "<BLANK<BLANK" ; "<COMPAT<COMPAT" ; "<0076<0069" % SMALL ROMAN NUMERAL SIX
	<U2165~<S8C7<S79B" ; "<BLANK<BLANK" ; "<COMPATCAP<COMPATCAP" ; "<0056<0049" % ROMAN NUMERAL SIX
vii	<U2176~<S8C7<S79B<S79B" ; "<BLANK<BLANK<BLANK" ; "<COMPAT<COMPAT<COMPAT" ; "<0076<0069<0069" % SMALL ROMAN NUMERAL SEVEN
	<U2166~<S8C7<S79B<S79B" ; "<BLANK<BLANK<BLANK" ; "<COMPATCAP<COMPATCAP<COMPATCAP" ; "<0056<0049<0049" % ROMAN NUMERAL SEVEN
viii	<U2177~<S8C7<S79B<S79B<S79B" ; "<BLANK<BLANK<BLANK<BLANK" ; "<COMPAT<COMPAT<COMPAT<COMPAT" ; "<0076<0069<0069<0069" % SMALL ROMAN NUMERAL EIGHT
	<U2167~<S8C7<S79B<S79B<S79B" ; "<BLANK<BLANK<BLANK<BLANK" ; "<COMPATCAP<COMPATCAP<COMPATCAP" ; "<0056<0049<0049<0049" % ROMAN NUMERAL EIGHT
xi	<U217A~<S8DB<S79B" ; "<BLANK<BLANK" ; "<COMPAT<COMPAT" ; "<0078<0069" % SMALL ROMAN NUMERAL ELEVEN

```

<U216A~<S8DB<S79B"; "<BLANK<BLANK"; "<COMPATCAP<COMPATCAP"; "<0058<0049" %
ROMAN NUMERAL ELEVEN
  xii
<U217B~<S8DB<S79B<S79B"; "<BLANK<BLANK<BLANK"; "<COMPAT<COMPAT<COMPAT"; "<0078
<
0069<0069" % SMALL ROMAN NUMERAL TWELVE

<U216B~<S8DB<S79B<S79B"; "<BLANK<BLANK<BLANK"; "<COMPATCAP<COMPATCAP<COMPATCA
P
"; "<0058<0049<0049" % ROMAN NUMERAL TWELVE

```

This character should file with 6, not with b:

```

<U0185 <S6F5;<BLANK;<BIN;<@0185 % LATIN SMALL LETTER TONE SIX
<U0184 <S6F5;<BLANK;<CAP;<@0184 % LATIN CAPITAL LETTER TONE SIX

```

SE: but TONE SIX is not a digit

This character should file with 2, not with s:

```

<U01A8 <S877;<BLANK;<MIN;<@01A8 % LATIN SMALL LETTER TONE TWO
<U01A7 <S877;<BLANK;<CAP;<@01A7 % LATIN CAPITAL LETTER TONE TWO

```

This character should file with 5, not well after Z, between WYNN & GLOTTAL STOP:

```

<U01BD <S917;<BLANK;<MIN;<@01BD % LATIN SMALL LETTER TONE FIVE
<U01BC <S917;<BLANK;<CAP;<@01BC % LATIN CAPITAL LETTER TONE FIVE

```

-----  
GB8. Korean  
-----

At the end of the default table, there is information about ordering Han (Chinese) and Hangul (Korean) characters: this comment reproduces the end of the table, and inserts to mark UK comments.

```

<U4E00..<U9FA5 <@4E00..<@9FA5;<BLANK;<MIN;<@4E00..<@9FA5 % Han

```

This only gives details about ordering of han characters using radical/stroke sequences. There is no information given, even in comments, about ordering in the order of Latin alphabet equivalents (as in pinyin in Chinese), or as kana equivalents (as in Japanese), or as hangul equivalents (as in Korean) although each is very common in East Asia.

SE: this would be accomplished by prehandling, or by (extensive) tailoring of the table; it is language dependent and irregular

By comparison there is some description below about ordering hangul syllables.

SE: but there is simple algorithm for this

```

% <UAC00..<UD7A3 <@AC00..<@D7A3;<BLANK;<MIN;<@AC00..<@D7A3 % Hangul
% Weights for Hangul syllables are built by equivalences to the jamo weights.
% A Hangul tailoring for a system which does not use combining jamos
% may choose to simply weight the Hangul syllables directly as shown above.

```

However, this does not state explicitly whether the weights

which are built by equivalences to the jamo weights should follow the Hangul jamo in row 11 onwards, or in row 31 onwards.

% order\_end

% END LC\_COLLATE

% Uncomment the line above to create a 14652-style  
% LC\_COLLATE definition.

-----  
GB9. Script-by-script ordering in ISO/IEC FCD 14651  
-----

In the earlier disposition of comments in mid 1998, not all UK comments about providing an order for scripts in ISO/IEC FCD 14651 were taken into account.

Leaving this to tailoring, as indicated in comment GB18 in the Disposition of comments, will not be satisfactory as it is anticipated that many applications and implementations will rely on the default table of ISO/IEC FCD 14651: GB 18 said:

GB18. All script identification and order will now be entirely left to tailoring with simplification of the syntax and by the same occasion of the table.

The UK considers that a reasonably predictable order should be implicit in the ISO/IEC FCD 14651 defaulttable, and that leaving script order entirely to tailoring is insufficient.

This extended comment (ref. GB9) proposes a rationale, describes such a table, based on other standardisation work in ISO/TC46/SC2, makes a comparison with UCS, and appends the UK's earlier concern in earlier comments.

Such ordering was implicit in earlier drafts of ISO/IEC FCD 14651, as noted in the earlier comments by the UK (see UK comments, section 3.A.2. Order of scripts) but is no longer specified in any single area of ISO/IEC FCD 14651.

-----  
GB9.1. Rationale.  
-----

- As there is currently no national recognised standard or convention which says where users can expect to find specific scripts in a multiscript listing (increasingly likely as UCS gets adopted and global business increases), and
- As the default order in ISO/IEC FCD 14651 is likely to be taken as the preferred order, as there is no other available guide,

the order in ISO/IEC FCD 14651 should be rational and predictable to users, without reference to other standards, such as UCS, with which many users may be unfamiliar, and to which they may not have access.

The order should also account for the likely repertoire of ISO/IEC 10646-1: 2nd edition and Unicode version 3.0, which incorporates amendments to ISO/IEC 10646, which are likely to be confirmed at the March 1999 meeting of ISO/IEC JTC1/SC2/WG2 in Fukuoka, Japan.

-----  
 GB9.2. Proposed script order in ISO NP 15921: Generalized conversion methods, suggested for adoption in ISO/IEC FCD 14651  
 -----

The order below gives (a) priority to scripts used in official languages, broadly similar to the order in UCS (ISO/IEC 10646 and Unicode). There is a broad West through East order, and within that (where relevant) a broadly North through South order, with (b) non-official scripts added at the end of that sequence, in a similar West through East order.

This order is also being adopted in the early drafts of ISO NP 15921: Generalized conversion methods, being developed in ISO/TC46/SC2/WG8: Transliteration and Computers.

(a) Scripts used in official languages (at country level) \*

1:	Americas/Europe:	Latin
2-5:	Europe:	Greek, Cyrillic, Georgian, Armenian;
6:	Near East:	Hebrew;
7:	West Asia/North Africa:	Arabic;
8:	Northeast Africa:	Ethiopic;
9:	South Asia:	Devanagari,
a-d	"	Bengali, Gurmukhi, Gujarati, Oriya;
e-h:	"	Tamil, Telugu, Kannada, Malayalam,
i:	"	Sinhala;
j:	"	Thaana;
k-n:	Southeast Asia:	Thai, Lao, Myanmar (Burmese), Khmer;
o-p:	Inner Asia:	Tibetan, Mongolian;
q-s:	East Asia:	Korean, Japanese, Chinese.

(b) Scripts used in official languages below country level \*  
 by minorities within countries, and in religious/historical texts

t-u:	Americas:	Cherokee, Canadian Aboriginal Syllabics;
v-x:	Europe:	Ogham, Runic, Glagolitic;
y:	Near East:	Syriac;
z:	East Asia:	Yi (Southwest China),

Notes:

\* Country status is taken at the year 1999, and based on the list of countries recognised by the United Nations at that date.

\_\_\_\_\_ end of UK comments;

## beginning of USA comments \_\_\_\_\_

Susan Bose  
For the US P-member JTC 1/SC 22

The US National Body votes to Disapprove the Second FCD Ballot for ISO/IEC FCD 14651, Information technology - International String Ordering and Comparison - Method for Comparing Character Strings and Description of a Common Tailorable Ordering Template [SC22 N844]. Please see comments below.

Its vote would be changed to YES if the following changes were made. The main goals of the UTC and US position are to ensure that

(1) Major collation implementations (POSIX, Java, Sybase, etc.) that currently produce satisfactory international orderings for Unicode can be conformant to ISO 14651, and

SE: Well, some minor updates may be needed, for the data tables at least.

(2) The proposed Unicode Standard Collation Algorithm (UCA), which pays close attention to the special requirements of Unicode conformance, can be conformant to 14651. The specification of the UCA can be found at <http://www.unicode.org/unicode/reports/tr10/> <<http://www.unicode.org/unicode/reports/tr10/>> .

SE: agree (but the UCA should not be immune to updates)

## TECHNICAL comments

The main changes that the UTC requires of 14651 can be summarized as:

## A. Levels

Conformant 14651 implementations must not be required to support more than the first 3 levels. (They are free to support more than 3, but not required to.) It is not at all clear from the current conformance clause how many levels a conformant implementation must support. To address this concern, make the following changes:

SE: This is a major problem. The extension to support more than 4 levels is not well-defined. Indeed it is not defined at all!! Any extension to more than 4 levels should not be counted as conforming to 14651. That's not to say that such an extension cannot be a good idea, it's just that it's NOT defined, and trying to define how to do such an extension does not seem justified for 14651. And decrease from 4 to 3 levels, ok, but ONLY IF it is defined in 14651 how that is to be done. Just deleting level 4 is not acceptable. The weight data for level 4 must then be used at level 3 instead.

a. On page 5, 6.2.1.1 Assumptions. The statement that "The number of levels can be extended in the tailoring phase by the end-user." should be modified to: "The number of levels can be extended or reduced in the tailoring phase." (Note also removal of the red-herring use of the term "end-user".)

SE: (agree to removal of the term 'end-user')

Tailorings that change the number of levels must give the entire table, and cannot be considered to be a 'delta'. For the purposes

of 14651 exactly 4 levels (with well-formedness restraints on how they are used, so at most 3 of the levels need be stored) is sufficient. Those who wish to have different number of levels may of course do so, but should not claim conformance to 14651. We can allow for 3 levels in 14651, but ONLY if the (redesigned!!) level 4 data is used at level 3 instead.

b. Add the following language to 6.2.1.1

"Conformant implementations of 14651 must support at least three levels. They may support more levels, but they are not required to for conformance. In the absence of such support, fourth and higher level information can be ignored."

SE: increasing the number of levels is NOT defined, and I cannot see how to define it well, without giving complete template tables that have more than 4 levels. I suggest not defining it, but avoid this altogether, and regard more than 4 levels as not conforming.

B. Position

Conformant 14651 implementations must not be required to support the position designator. (They are free to support the position designator, but not required to.) In addition, the text following the paragraph in 6.2.2.2 starting with "Generally" is informative, not normative, and does not belong in this section.

SE: the 'position' method should be replaced by a redesigned level 4 and informative annex Q. Canada will probably want to be able to say "backwards" for level 4, to closely approximate their current ordering. Arguing that "position" must be supported because one "must" support exactly the current Canadian specification is not viable. The current specifications in 14651 is far from the current de facto Swedish specifications for ordering. Canada cannot be the only one insisting on a particular specification even though there is no absolute cultural need.

To address these requirements, make the following changes:

On page 5, 6.2.1.1 Assumptions. The sentence starting "The user shall take care that,..." should be omitted. It is very strange in that it normatively requires a user to "take care that...", but what they must take care is then

expressed as a conditional with a protasis expressed as "so that the last level may processed [sic]". The whole sentence is an incomprehensible admonition as it stands. What we want is a clear statement that the standard

does not \*require\* special processing at the last level, but does \*allow\* it (see below).

SE: the last level SHALL be processed in EXACTLY the same way as all the other levels. There is not sufficient justification to do anything special at the last level.

In 6.2.1.2, change "A specific property" to "An optional property"

In the first paragraph of 6.2.2.2, change the condition to read:

"If there is an order\_start entry that does not use the position value at level m of a block, or if there is no order\_start entry, then the formation of subkey level m is done in exactly the same way as the above-defined formation. Otherwise..."

Add the following language to 6.2.2.2 after the paragraph starting "During".

"Conformant implementations of 14651 are not required to support the

position value. They may support this value, but are not required to for conformance. In the absence of such support, the position value is ignored."

d. Split 6.2.2.2 into two parts. The new part 6.2.2.3 would begin on the bottom of page 6, just above the paragraph starting "Generally," and should be entitled: "General interpretation of each level in the Common Template Table".

e. In the new 6.2.2.3, delete all but the first sentence in the paragraph labeled "Level 4". That would disconnect the interpretation of Level 4 from whether or not keys are constructed for Level 4 using the position mechanism.

f. Move the paragraph following the "Level 4" paragraph (starting "In the table, this behavior is...") up into 6.2.2.2 after the note about forward and backward scanning.

g. Move the new section 6.2.2.3 into some other place in the standard. It is informative, and should not be part of the normative clause 6.

SE:

1. Scope
    - 1.1 In scope
    - 1.2 Not in scope [thing related, but not included]
  2. Conformity
  3. Normative references
    - If possible, ONLY
      - a. 10646-1:2000(?), i.e. revision 2,
      - b. Unicode 3.0, and
      - c. 8879: SGML (or XML, if possible)
    - Definitely not 14652, nor 8859.
  4. Symbols and definitions
    - 4.1 Symbols
    - 4.2 Definitions
  5. Data table format for Annex A
    - [the format is normative for Annex A only]
    - 5.1 Multiple level weights for collation items
    - 5.2 Well-formedness restrictions
    - 5.3 [XML DTD, and explanation]
  6. Reference method for computing an ordering key
    - Detailed explanation on how the key is computed by the reference method. [the **ordering implication** of this method is normative; not the key computation itself]
  6. Collation based on ordering keys for strings
    - 6.1 Prehandling before computation of keys
      - Presence** of prehandling phase is normative, no particular prehandling is required
    - 6.2 Ordering of strings based on ordering keys
      - [collation; comparison at level]
  7. Tailoring of the weight table
  8. Documentation requirements
    - [3 or 4 levels; actual (tailoring of) table format used; actual symbolic weight names used, if any]
- Annex A: Common Template Table [in XML/SGML format; the **ordering implication** of the data is normative; the format is not normative, nor are the weight names used]
- Annex B: Tutorial
- Annex C: Preparation
- Annex D: Thai (Nxxx)
- Annex E: Tailoring examples, and some example ordered strings

[all must be based on the data and names in Annex A]

E.1 Possible Canadian tailoring

E.2 Possible Swedish tailoring

E.3 Possible Japanese tailoring [length marks...]

E.4 Possible Thai/Lao tailoring [char swap...]

Annex F: [SE suggested annex Q]

Annex G: Bibliography

### C. Backward

Conformant 14651 implementations must not be required to support the backward designator at any level but level 2. Moreover, conformant 14651 implementations are not required to have anything but a global backwards switch (e.g. that all weights at a particular level are either uniformly forward or backward). (They are free to support the multiple levels of backwards, and fine-grained directionality [on a per character basis], but not required to.) To address this requirement, add the following language to

#### 6.2.1.2:

"Conformant implementations of 14651 are not required to support the 'backward' scanning direction at any level but level 2. In the absence of such support, the scanning direction is treated as if it were 'forward' at every level but level 2.

"Conformant implementations of 14651 are also not required to support different scanning directions for different blocks. In the absence of such support, if any block has a backward scanning direction for any level, then all blocks are considered to have that scanning direction at that level."

To the note at the end of 6.2.1.2 starting "In ISO/IEC 10646-1, ArabicÖ, add the following text:

"However, the Unicode Standard does proscribe the logical order of all characters, including Arabic and Hebrew. Implementations conforming to the Unicode standard will not use the backward scanning property."

[Note: the current description of per-block backward and forwards support in 14651 does not serve the goal it was designed for. Since languages and scripts share a great many characters in common, a choice of either forward or backward will cause those common characters to disrupt the order within text of the other direction. For example, suppose Greek is ordered forwards, and French backwards. If digits, for example, are forward then they disrupt the French accents. If they are backward, then they will disrupt the Greek accents.

Even going to a forward, backward, neutral model, as in UCA Version 2 will not work. No matter which heuristics are used to assign the direction of the neutrals, sometimes the choice will be incorrect.

Mixing blocks of different direction is not well supported in industry practice. Most implementations of POSIX do not support it, nor does Java. Forcing these implementations to revise without solid justification is unwarranted. However, as long as implementations are not forced to implement mixed scanning directions, the current language can remain.]

SE: I have no magic solution to this either.

### D. Unicode conformance

ISO 14651 must permit a conformant implementation to do the following.

(These are required for conformance to the Unicode Standard.)

D.1. Treat canonical equivalent strings as precisely equal in ordering.

D.2. Perform Thai/Lao-style character reversal (see UCA Step 1).

SE: This appears to be fairly easy to incorporate as a tailoring of the table (maybe slightly lengthy).

D.3. Exclude irrelevant combining marks when looking up matches for contracting characters (see UCA Step 2).

SE: allowed for by prehandling and "any method resulting in the same order is acceptable".

D.4. Exclude unsupported characters from a collation ordering, or cause them to be sorted in Unicode code point order.

Items D.1 through D.3 are probably covered by section 6.1. However, to ensure that they are, these three items must be added in Notes as examples of conformant implementations, with the following language:

"Note: to allow conformance to the Unicode Standard, conformant

implementations may

a. Treat canonical equivalent strings as precisely equal in ordering.

b. Perform Thai/Lao-style character reversal.

c. Exclude irrelevant combining marks when looking up matches for contracting characters.

For more information, see Unicode Technical Report #10."

D.4 is commonly implemented as UNDEFINED in POSIX and other standards. It must be included so that implementations working in low-memory environments that do not need the full default collation rules can use a small subset, and have all other Unicode characters sorted by code order. To fix this problem, make the following changes:

In 6.3.1 rule 23, add the text " | UNDEFINED" to the end of the line.

At the end of 6.2.2.1, add the text:

"If there are no tokens corresponding to a character of the input string, then the character is undefined. Undefined characters are sorted with respect to defined characters as if they were at the position UNDEFINED in the Template Table. (If there is no UNDEFINED token in the table, then the table is interpreted as if there were one at the very end.) The ordering of undefined characters with respect to other undefined characters is not specified by this standard.

Note: there are two common treatments of UNDEFINED characters. The first is to sort among them as if their level-one weight differences were based upon their UCS character code. The second is to sort them as if they all had the same level-one weight, and their second-level weights were the same as their UCS character codes."

SE: This does not appear to necessarily cause any difference in order.

E. Stability:

The data for both UCA and 14651 must be updated to the level of symdump-2.1.9.txt on the SC22/WG20 server (incorporating all of the

individual changes that the US would be asking for).

SE: and further changes to level 3 and 4!

No further changes to other parts of 14651 that would substantially affect the current major collation implementations are acceptable to the UTC or the US national body. In particular, the default data for levels 1, 2, and 3 used by 14651 must be consistent with the UCA data (though perhaps not in the same format). The data was synchronized; this must not diverge due to ballot comments.

SE: They should of course remain "synchronized". Still changes to level 3 and 4 are requested by SE in order to correct problems with the current table data.

#### F. Specific Technical Comments

Section 6.3.3. is not well defined. Rule I2 (reorder\_after) must state what the relationship is between the table lines (X) between the entries and the tailored line containing the symbol definition (S). That is, suppose we have the following rules:

```
<UA> <A1>;<A2>;<A3>;<A4>
<UB> <B1>;<B2>;<B3>;<B4>
      Ö
<UX> <X1>;<X2>;<X3>;<X4>
<UY> <Y1>;<Y2>;<Y3>;<Y4>
```

We want to tailor that table by adding a reordering rule:

```
      reorder-after <UX>
<UX> <X1>;<X2>;<X3>;<X4>
<UY> <Y1>;<Y2>;<Y3>;<Y4>
reorder-end
```

What does the normalized output (I4) look like? According to the rules, it could be:

```
<UA> <A1>;<A2>;<A3>;<A4>
<UX> <A1+1>;<MIN2>;<MIN3>;<MIN4>
<UY> <Y1>;<Y2>;<Y3>;<Y4>
<UB> Ö
```

Or it could be

```
<UA> <A1>;<A2>;<A3>;<A4>
<UX> <A1>;<A2>;<A3>;<A4>+1
<UY> <Y1>;<Y2>;<Y3>;<Y4>
<UB> Ö
```

Both of these operations might be required for a tailoring, but the rules I1 and I2 do not distinguish between them. Moreover, the rules do not say what is the effect on UB-does it have the same level distinction with the last of the new line(s) that it used to with UA?

SE: This is incomprehensible for several reasons:  
 1. reorder makes sense only for weight declarations, since all weights must be declared before use  
 2. "+1" on a sequence of weights does not make sense.

3. the order of the actual data lines, after the weight declarations, is immaterial, as long as they are not conflicting in content (that they happen to be sorted in the reviewed tables, is only a matter of reviewing convenience).

To address this problem, the following (or equivalent) change must be made.

6.3.1, rule 32. Change to:

```
reorder_after_entry := 'reorder-after ' target_symbol ' at level ' digit+
```

6.3.3 rule I2. Add:

" The reorder entry effectively inserts lines X through Y between existing lines A and B, producing the new ordering <A, XÖY, B>. The level of the reorder-after statement determines the level of the differences between A and X. The level of the difference between Y and B is the stronger of the old difference level between A and B and the new difference level between A and X. For example, suppose we have the following lines (where B1 != A1):

```
<UA> <A1>;<A2>;<A3>;<A4>
<UB> <B1>;<B2>;<B3>;<B4>
  Ö
  reorder-after <UX> at level 2
<UX> <X1>;<X2>;<X3>;<X4>
<UY> <Y1>;<Y2>;<Y3>;<Y4>
reorder-end
```

will produce the normalized result equivalent to:

```
<UA> <A1>;<A2>;<A3>;<A4>
<UX> <A1>;<A2>+2;<MIN3>;<MIN4>
<UY> <Y1>;<Y2>;<Y3>;<Y4>
<UB> <Y1>+1; <MIN2>;<MIN3>;<MIN4>"
```

SE: WHAT????; +2??? +1??? MINn???

It must be clearly stated that a reorder-entry also \*removes\* the lines from where they used to be.

In addition, the following text must be added at the end. "The reorder-entries must be processed in order during normalization, otherwise incorrect results will be obtained."

The rule I3 also unclear in that it doesn't discuss changing the actual numerical values of the weights. Yet the assignment of numerical values to weights doesn't occur until I5. If the assignment is not done in the reordering, then the subsequent assignment of weights would defeat the purpose of the reordering. This must be clarified.

#### G. Unicode Reference

Given their importance in the development of this standard, and the fact that the vast majority of 10646 implementations are in fact Unicode implementations, the Unicode Standard must be referenced in Section 3, and Unicode 2.0, TR #8, and DTR #10 must be referenced in the Bibliography.

SE: to reference a DRAFT TR should not be done in the final version of 14651, especially not if a more recent version is then available.

## EDITORIAL Comments:

A. The BNF rules in 6.3.1 should be supplemented by a textual description of the format. The well-formedness conditions can be interleaved with the textual description for clarity.

SE: Those BNF rules should be replaced by an XML DTD. The well-formedness constraints should be as stated in N641 (in comments) plus statements on 'declare before use'.

B. Examples must be added to 6.3.3 to make the requirements clear, as above.

C. Change the explanation in 6.3.1 BNF Syntax Rules to fully describe the notation (e.g. Aho and Ullman):

"<O> refers to terms not defined in this BNF syntax, and assume general English usage.

'O' refers to literal characters

(O) used for grouping

X Y matches the token sequence X followed by Y

X | Y matches either X or Y tokens

X\* matches zero or more repetitions of X

X+ matches one or more repetitions of X

{X} matches one or more repetitions of X "

SE: please refer to ISO 8879 (SGML) instead.

D. Certain wordsmithing needs to be done for clarity and accuracy. Take the introduction alone:

\* Sentence #2 is untrue-that is not the only purpose; others are mentioned below.

\* #4 is has an incorrect reference "English" is not a "past approach".

\* The last sentence of para#2 is incorrect-one does not "achieve challenges"; one might "overcome them", if that is what is meant.

\* "result discrepancies" must be changed to "discrepancies in results"

\* "excellent" sounds like blowing our own horn too much.

A full list would take too long to compile-marked-up copies will be brought to the Pennsylvania meeting.

SE: A lot of word-smithing needs to be done; see also the Irish comments, and the revised TOC above.

Introduction, page iv, first paragraph

a) The meaning of the word "universal" is ambiguous here. It perhaps implies that there may be other non-Universal properties which are not retained during tailoring. Does this paragraph intend to indicate that all scripts have these properties, or does it mean that the particular values of these properties as defined for each script is common to all users of the Common Template Table, if they are not tailored? One can presume the latter, but it should be more clearly stated. A suggestion might be to change "retaining universal properties for other scripts" to "retaining properties already defined for other scripts."

b) This paragraph seems to be saying that the purpose of this standard is to improve on collation algorithms based only on binary coded character values. If this refers to the use of the binary coded values without associating a weight to those values, then the next comment about English, with uppercase characters only and no punctuation, being an exception, makes

sense. However, it is a rather weak statement, given that even the simplest collation algorithms generally apply some weighting scheme. A suggestion might be to simply delete the remainder of the paragraph beginning with "The purpose of such a mechanism"

Introduction, page iv, second paragraph

In the first sentence "this is one of the major flaws that affect portability" it is not clear what "this" is referring to, or what is "flawed". A suggestion might be to combine the sentence with the parenthetical remark: "That different programs use different ordering specifications is a significant problem reducing portability between countries and between applications."

Section 1 Scope

In the first paragraph "A simple method of reference" delete "of reference", as the method is for comparing not for referencing. It is understood that this standard is defining a method which can be a reference for international ordering.

In the last bullet in this section, delete the final 2 words "to order" in "A context-dependent ordering which would require complex transformation of data to order."

Section 2 Conformance

The requirements imposed by the second paragraph are unclear. In the last sentence "and how the comparison method they use If different" the "I" in "if" should not be capitalized. There should be a comma after the word "use".

Section 4 Definitions

4.6 delta- change "relatively" to "relative"

4.8 graphic character- change

"To a graphic character normally corresponds a glyph." to "A graphic character normally corresponds to a glyph."

4.9 level- This definition is ambiguous as "depth" is not defined. The author should provide a more meaningful definition.

The word "token" should be replaced throughout the document by "weight", unless the definition is in error.

Collating symbol and collating element should be change to collation symbol and collation element.

The difference between ordering key and collation element is not clear from the definitions.

"preparation": speaking of the actual source strings being modified here and in 6.1.1 is worrisky-it is copies of the source strings that are modified, if anything.

Section 5 Symbols and abbreviations

The last 2 sentences in the first paragraph can be worded more grammatically correct and "covered" can be clarified by changing "What is being referenced is a graphic character, independently of its coding, and any character set whose subrepertoire is taken into account in ISO/IEC 10646-1 is covered in this way." to "This is a way to reference a graphic

character, independent of its coding. Any character set whose subrepertoire is taken into account in ISO/IEC 10646-1, is included in this specification by this nomenclature."

Section 6.1.1 Preparation of character strings prior to Comparison

In the first paragraph, will the reference to telephone-book ordering be universally understood, or should the specific problem referred to in this example be brought out?

In the second paragraph, the words "but not both" should be added to the phrase "An application conformant to this international standard shall at the minimum prepare the string so that sequences using either combining sequences or using precomposed characters"

In Note 1 of this section, remove the extraneous " a " in "precomposed characters affected by a diacritics,"

Section 6.2.1.1 Matrix of n lines

6.2.1.1 "matrix of n lines. N is the number of characters in the repertoire used."

This would exclude multiple characters sorting as 1. Also, "matrix" is unclear; what is meant? It is also not really a "transformation table". What it is is a mapping table from character sequences to collation elements.

Section 6.2.2 Key composition and

Section 6.2.2.1 Formation of subey level 1 through (m-1)

SE: levels 1-4; generalization to more than 4 levels requires a full new data table, so that a sensible generalization of the well-formedness rules can be followed, and should not be done for 14651; no separate processing of level 4 is acceptable, though the data for level 4 must be completely revised.

This section is very unclear and must be made more precise and would greatly benefit from an example. In particular, references to directionality are made with respect to string processing, levels and characters and is hard to understand. Stacking is described but unstacking is left to the reader's imagination. In particular it is not clear when to unstack.

For example, in the second paragraph after the parenthetical remark, it states: "and the new direction is backward" it is not clear how many attributes of the algorithm are affected. The character has the property of being backward, this changes the direction of the current level i, and might be presumed to also affect the scanning direction of the input character string, which is described as initially forward in the first paragraph.

If we understand the proposed algorithm correctly, it would benefit the specification to state clearly:

1) That scanning of the input character string is always forward thru the logical sequence of the string.

2) That reaching a character with a backwards property changes the current direction of level i from forward to backward, and commences stacking of position and token.

SE: no, it commences "stacking" of **weights**.

3) That reaching a character with a forwards property when the current direction of level i is backwards, changes the level's direction to forwards and commences unstacking, with a description of what is involved in unstacking.

SE: well, it takes the stacked weights and **appends** them ('backwards') to the (current) end of the key being computed.

#### Section 6.2.2.2 Formation of subkey level m

SE: no separate processing of level 4 is acceptable, except that it too may be 'backwards' (for Canada; it is doubtful if anybody else wants that).

The first sentence should change "uses" to "use".

The first paragraph begins with discussion of order\_start\_entry which is not yet introduced . This should be characterized and the subsequent reference to having or not having a position, expanded upon for clarity. The significance of using the table as-is versus changing it in accordance with frequent market practice should also be clarified and the alternative behaviors of the ordering described. An explanation of why the Common Template Table does not follow frequent market practice might also be offered.

In the second paragraph, the sentence "When the character is not assigned at level m in the table, it is ignored for the formation of subkey level m and no pair is concatenated." Might be better moved to the end of the paragraph, so the subsequent sentences cannot be perceived to be part of the condition "when the character is not assigned at level m".

In addition, this paragraph is the first indication that a character might not have entries for every table level. There should be some discussion of this and its impact on behavior of the ordering.

The first sentence in the description of level 4 states: "This level represents the level common to all scripts or the level not specifically belonging to any script." We do not understand what this means. How and why is this level different from the other levels?

In the last paragraph of this section, it is stated: "In the Common Template table, definitions of these characters for level 1 to 30". We do not understand which characters are referred to by "these characters". Perhaps the author should state: "In the Common Template table, characters that are assigned values at level 4, are exclusively assigned to level 4, and are ignorable, and have no values assigned, at levels 1-3.

It might improve the readability and understandability of the specification, if the actual description of the Common Template table was moved out of this section to the later section on the Common Template table and if the information in level 4, about the formation of the level 4 or level m

subkey, was included with the first 2 paragraphs of this section, describing the key formation.

Section 6.3.4. :

The first paragraph can be simplified considerably to:  
Two collation weighting tables are said to be equivalent if any comparison of strings using those tables results in the same ordering.

Section 6.4 Declaration of a delta

In the second paragraph, conformance is described as declarable if a fixed table is used by the application. Can an application conform if it does not make use of a fixed table analagous to the Common Template table? Also, the term "comparison table" is not defined. Presumably this is the name for the transformation table used with the comparison method and this should be stated or clarified. Also the word "relatively" should be "relative" in this instance.

In the first bullet, there is a reference to direction values being dependent on writing systems. Earlier, the specification pointed out that scanning direction is in fact independent of the direction of writing, so this may be confusing and misleading to readers.

In the first paragraph after the 4 bullets, the sentence beginning with "In cases where the applications hasÖ" should be changed to "In cases where the applications haveÖ".

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end of SC22 N2911

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