Japan NB reviewed Principle and Procedure of IRG (N1823Draft3R) and raises comments and questions as follows:

1. Meta level and general comments
   1.1 Is there any necessity to mention the relation between Compatibility Ideographs and IVS/IVD.

   1.2 There are several confusion between non-cognate and abstract shape concept. Even if the abstract shapes are completely same, there are possibilities to be non-cognate.

   1.3 In Annex S, there are two different cases of examples. One is to be amended and elaborated time to time. The other is should never modified for ever. There should be clear distinction between these two different cases. The Source Code Separation principle was applied only once when the original ISO/IEC 10646 was developed in 1993, and should never applied for ever.
1.4 [2.2.1.d(1)]
The limitation of 4000 characters for each development cycle should be changed to 8000 or not.

1.5 [6]
This clause seems to be out of scope described in [1.2].

1.6 [5]
This clause seems to be out of scope described in [1.2].

2. Technical comments
2.1 [2.1.2]
There is a notation as “Basically, two submitted print forms of glyphs with different radicals are distinct characters even if they have the same phonetic component such as '理'(U+7406) and '鯉'(U+9BC9).” This notation seems somewhat meaningless, because almost, but not every, Ideographic characters have same phonetic component.

2.2 [2.2.1]
“Different information may be handled differently as specified below.” The meaning of “information” is ambiguous, change like “Submission may be categorized by its contents of the proposal as follows:”

2.3 [2.2.d(5)]
Add following sentence:
If the proposer explicitly raise question about unification/dis-unification for concrete cases in the proposal of characters, the 5% rule should not be applied for such cases. (This case is raised in IRG Vietnam during the discussion about the proposal from SAT.)

2.4 [2.2.1.d(2)(b)]
“Ideographs currently in WG2’s working drafts (including PDAM (Proposed Draft Amendment), FPDAM (Final Proposed Draft Amendment) and FDAM
This sentence is not accurate. PDAM and FPDAM are only used for Amendments. As for International Standards themselves, corresponding stage is DIS. So, delete “including ....” is better.

2.5 [2.2.1.d(4)]
In Mis-Unified Character section, there need some mentioning about the addition of non-cognate same glyph shape characters. These cases may be assumed as mis-understanding as same character.

2.6 [2.2.1.d(5)]
Add version numbers of Excel.

2.7 [2.2.1.d(5)a]
Treatment of Z source. It is better to explicitly mention about Z source. As for Z source, there are possibilities to have more than one Z sources for one character. Is there any necessity to explicitly mention for these cases? This issue may be included in Annex D.

2.8 [2.2.1.d(5)b]
bmp format for bitmap data is private format originally for Microsoft’s Windows. It is better to add PNG format (ISO/IEC 15948).

2.9 [2.2.1.d(5)c]
“.” should be inserted between radical number and traditional/simplified flag. Also, this flag should be applied for glyph shapes mentioned in Annex A.a, there is no need that the characters are genuine simplified ones in strict meaning. For example, Japanese “麺” is not a simplified character, but simplified flag “.2” should be added.

2.10 [2.2.1.d(5)d]
As discussed in previous IRG in Hanoi, if more than one glyphs are unified in one code position and there are different interpretation between actual
shape and IRG N954AR, basically the stroke count in IRG N954R should be applied. As for other cases, i.e. there is no unification among different glyphs, the stroke count may be counted according to the actual shape. IRG N954R is not the absolute rule.

2.11 [2.2.1.d(5)e]
First Stroke information is not mandate condition for proposals. To add First Stroke is encouraged, however, technical editor is in charge to modify or add the appropriate First Strokes.

2.12 [2.2.1.d(5)h]
Harmonizing with [2.2.d(1)], change the word “variant” to “characters to be discussed in IRG if unifiable or not”. Also the candidates with this column should be excluded from 5% rule, to encourage to fill this column.

2.13 [2.2.1.e(1)e]
Clarify the multi column notation and source notation form of Compatibility Ideographs.

2.14 [2.2.3(b)]
Duplicated description with [2.2.d(5)h]. It is O.K. to be duplicated. Using Questionable Characters as a rely point to refer Evidence. The contents of this section should be overlapped and harmonized with the contents in [2.2.d(5)h].

2.15 [2.2.5]
In here also the description should be written, that, if the proposer explicitly raise the question about unifiable/un-unifiable issue in “Similar Indeographs and Variant Ideographs” column, such characters should be excluded from 5% rule.
If there are some mentioning about Questionable Character at the stage of submission, such characters should be excluded from 5% rule.
2.16  [2.3.3.b]
"unless a split happens" → "unless once a unified proposed characters are agreed to be dis-unified during the process"
Changing 2.3.2.b and 2.3.2.c, it changes more understandable.

2.17  [2.3.4]
Japan N.B. has strong concern about current distinguish process on M-set and D-set, however, Japan N.B. has no clear answer for the issue. Japan N.B. requests IRG to discuss to find better process.

2.18  [2.3.4.e]
To make careful minor alteration of the glyphs on the process, following change should be make.
From: “However, member bodies may submit minor alteration of characters with provision of justification ONLY at the final stage as long as the alteration is unifiable with the original character.”
To: “However, member bodies may submit minor alteration of characters with provision of justification ONLY at the final stage or with explicit approval from IRG as long as the alteration is unifiable with the original character.”

2.19  [2.3.5.f]
This clause is very dangerous in terms of quality assurance, so this clause should be deleted. The result of discussion about unification/dis-unification should be accumulated in IRGWDS.

2.20  [2.4.1.b]
Once the character in D-set is disposed to be included with appropriate correction, the character should not back to M-set, but to added to some new Suitable/Stable Set.

2.21  [2.4.2.c]
This clause is very strict, but in reality is it possible?
As a matter of fact, M-set as a working set and S-set as a candidate for standardize should be differently treated. Theoretically, it is almost impossible to make M-set with no errata with ordinary comment and question based checking process, without IRG discussion and disposition for EVERY ALL characters. On the other hand, once discussed and disposed characters are principally STABLE. So, from quality assurance control perspective, S-set and M-set should be separately handled to the very end of the developing process, and only merged in the very last stage just before submission to WG2 after careful reviewing process in IRG.

Currently this process is treated by project editor.

Explicitly write that, the serial number, given by technical editor at the first stage, should not be changed to the very last stage of developing work.

Usually, is the version number recorded?

There needs some description about experts’ comments and attendance. Theoretically and as a matter of fact, there are some experts not affiliated with a member body.

After 3.4.d make new clause 3.4.e with description as follows:
“If new unification or non-unification cases or rules are agreed, IRG should instruct technical editor to modify IRGWDS to reflect the agreement for future works.” “5% rules will not be considered for the unification based on newly agreed unification rule.”
2.28 [3.4.d], [3.6.d]
These clauses should be deleted.
The unification/dis-unification rule will be changed during the IRG discussion, so to apply 5% rule based on changed unification rule is not fare to the submitters.

2.29 [3.5],[3.6]
These clauses can be read as that the review process has fixed review cycles. However, as a matter of fact, currently, the review cycles are repeated until the IRG agreement that the quality of the candidate character set reached stable and certain quality.

2.30 [3.8]
If the characters in D-set are postponed to the next candidate set, the unique identification number should be kept same to inherit the discussion.

2.31 [3.8.d]
This clause has some controversial issue. There are two different categories of D-set characters. One is characters, which reached final agreement to be unified. These characters should be recorded in IRGWDS. The other is characters, which are only postponed without final agreement, and need more discussion.
Anyway, it might better to once dispose D-set, and re-submit based on each N.B. requirements.

2.32 [4]
There is no S for member body abbreviation. Is Singapore identifier needless any more?
This comment is already mentioned in other clauses.
From quality assurance perspective, it is dangerous idea to move back once discussed and disposed characters in D-set to M-set. The characters once discussed and disposed characters should be accumulated in some new
S-set(Stable-Set). M-set and S-set should be clearly distinguished. As a matter of fact, current M-set IS “still neither commented nor questioned” character set, absolutely NOT “stable and reliable” character set. There still remains the possibility of questionable characters in the M-set for ever. There are two possible different way to reach stable character set. One is “Select pure water from the pool” way. The other is “ Remove muddy water from the pool” way. These two different way can be done simultaneously. However, these two ways should not be merged. The marge should not be done until the very last stage just before the submission to WG2.

2.33 [4.1] Wrong or Missing Glyph in Possible Comments by a Reviewer column should be clearly mention that the proposed glyph is different from the standardized glyphs in criteria of Annex-S. Wrong KangXi radical / Strokes count / first stroke column. The importance of first stroke is much less than KangXi radical or stroke count. So in here, first stroke should be deleted.

2.34 [4.2] “Checked against all standardized and working set ideographs with radical X and stroke count of Y±2” in Possible Comment” by a Reviewer column. This statement should be applied only for characters which are impossible to describe with IDS.

2.35 [4.3] This clause is overlapped with [4.1]. “Wrong or Missing Glyph”. So the statements in this clause should be merged with “Wrong or Missing Glyph”.

2.36 [E.3] There seems neither procedural description how to assign MWDS Editor nor how to endorse the modification.
This Annex is closely related to [3]. It is better to explicit both way reference. Also the consistency of description should be carefully checked.

2.37 [K]
The column for Pinyin is deedless.

3. Editorial Comments

3.1 [Table of Contents]
In contents pages, there is no [Annex K].

3.2 [2.1.3],[2.1.4]
The indents of paragraphs are broken.

3.3 [B.1]
Delete “at IRG Meeting No.25”. Reference IRG document number is good enough.

3.4 [B.2.8]
What is “DC”. There is no description in Glossary, too.

3.5 [I]
Link to WG2 Principles and Procedures is broken.

3.6 [Glossary]
“ISO 10646” should be changed to “ISO/IEC 10646”.
The description for Compatibility Ideographs should be changed from bold font to normal font.
Add description about “DC”.