Neo-Brahmi Generation Panel:

Analysis of comments for Telugu script LGR Proposal for the Root Zone

Revision: June 30, 2019

Neo-Brahmi Generation Panel (NBGP) published the Telugu script LGR Propsoal for the Root Zone for [public comment](https://www.icann.org/public-comments/kannada-oriya-telugu-lgr-2018-08-08-en) on 8 August 2018. This document is an additional document of the public comment [report](https://www.icann.org/en/system/files/files/report-comments-kannada-oriya-telugu-lgr-31oct18-en.pdf), collecting NBGP analyses as well as the concluded responses. There is
1 (one) comment submission. The analysis is as follow:

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| No. | 1 | From | Liang Hai |
| Subject | A quick review of the Telugu proposal |
| Comment | 2, “telɯgɯ”: This is probably a phonetic transcription, not an accurate transliteration that should be used in this document. |
| NBGP Analysis | The NBGP acknowledges the comment. |
| NBGP Response | Updated the proposal in section 2 to use ‘Telugu’ |
| Comment  | 3.5, “… and 16 dependent signs”: 15. |
| NBGP Analysis | There are 16 Matras: 14 Matras are in the repertoire, 2 Matras are excluded from the repertoire. |
| NBGP Response | No action required. |
| Comment  | 3.5.1: Vocalic l should be categorized with vocalic rr and vocalic ll. Transliteration of vocalic ll is wrong. |
| NBGP Analysis | Agree. |
| NBGP Response | Update as suggested. |
| Comment  | 3.5.1, R1, “ca= a consonant with an inherent ‘a’”: When discussing text encoding, Indic consonants naturally are with an inherent vowel. Try to distinguish phonetic sequence and written forms and encoded character sequence. The 3 lines under R1 are not helpful. |
| NBGP Analysis | The comment does not affect the normative part of the LGR. |
| NBGP Response | No action required. |
| Comment  | 3.5.3: The introduction of arasunna usage is unclear. Is it commonly used today or not? |
| NBGP Analysis | The arsunna is not used frequently and it is not in the MSR. |
| NBGP Response | No action required. |
| Comment  | 4.1: Good to see the usage of ZWNJ to be clearly introduced here. |
| NBGP Analysis | Comment is noted. |
| NBGP Response | No action required. |
| Comment  | 4.2: Unclear how the common case of ZWNJ usage is to be dealt with by domain name applicant. Will the applicant be allowed to use ZWNJ? If not, then it’s not particular clear how it’s decided to forbid ZWNJ, given the strong and unambiguous usage of it. |
| NBGP Analysis | The ZWNJ is not allowed per IDNA2008. |
| NBGP Response | No action required. |
| Comment  | 5: It is appropriate to exclude U+0C58 tsa and U+0C59 dza? |
| NBGP Analysis | U+0C58 and U+0C59 is not in the MSR. |
| NBGP Response | No action required. |
| Comment  | 5.2: Apparently U+0C44 TELUGU VOWEL SIGN VOCALIC RR should be excluded. |
| NBGP Analysis | It is widely supports on Telugu keyboards. Therefore, the NBGP decided to include the code point. |
| NBGP Response | No action required. |
| Comment  | 5.3, Various signs: The description doesn’t make sense. These two characters should be excluded because they’re part of vowel signs that are already atomically encoded and encluded. U+0C55 is not meant for encoding hā (unless it’s decided other irregularly written consonant–vowel structures need to be encoded visually too). |
| NBGP Analysis | The comment is uncleared. U+0C55 is already excluded. |
| NBGP Response | No action required. |
| Comment  | 5.3, Historic phonetic variants: Unclear why “Phonological variants shall not be permitted”. |
| NBGP Analysis | The NBGP agree to consider variant based on the visual forms. For other similarity could be taken care of by other related panels during the TLD string evaluation process. |
| NBGP Response | No action required. |
| Comment  | 6, “There are no characters in the Telugu Unicode chart that either in simple form or in combined form are deemed similar by NBGP.”: Should mention the precondition of WLE. |
| NBGP Analysis | The Variants discussion cannot be seen in isolation from presence of WLE rules, at least in the context of this document. |
| NBGP Response | No action required. |
| Comment  | 6.1. There shouldn’t be disposition of “blocked” in the table (or anywhere), because it’s not even proposed to be variants. The example i and ii as well as the table are all very confusing. Vowel sign o and oo need to be discussed separately as they have different behavior. See [https://www.unicode.org/L**2/**L**2014/14005**-telugu-kannada-vs-o-oo--UTN.pdf](https://www.unicode.org/L2/L2014/14005-telugu-kannada-vs-o-oo--UTN.pdf) for a better introduction. Also, హా should be introduced in this section too, although it’s not proposed either (because of excluded character). |
| NBGP Analysis | Given the fact that this specification deals with the root zone, the restrictiveness of ‘blocked’ variant disposition is intended. |
| NBGP Response | No action required. |
| Comment  | 6.2 Inappropriate restriction. This is like restricting one between “colour” and “color” because they’re alternative spellings. “This can be disallowed by the WLE rule: H cannot follow a nasal consonant.” — Inappropriate rule, as the authors didn’t even consider geminated nasal consonants (eg, in **కన్నడ** kannaḍa). |
| NBGP Analysis | Originally, the GP disallowed Halant following Nasal-C. However, in response to public comment and subsequence comment in RZ-LGR-3 public comment that the rule was too restrictive to spelling rules, and the fact that homophonic variant is not in scope of Neo-Brahmi LGRs, the GP decided to remove the restriction. |
| NBGP Response | Edit the rule for H to be H must follow a consonant. |
| Comment  | 6.4.1: Inappropriate analysis. Confusbale standalone letters don’t necessarily mean confusable contextual forms (eg, vattu forms can have different ascending behavior and different positioning behavior and different letterforms). Also it’s unclear if the authors have examined contextual forms independently from the similarity of standalone letters. Further, many contextual forms are expectable in a small context (eg, one can tell a vattu exists in well-formed text as long as a consonant is preceded by virama), thus it’s not necessary to enumerate akshars and overload the variant set. (Table 16 is a duplication of Table 10.) |
| NBGP Analysis | NBGP agreed to analyze both standalone letters and the joint forms. The extensive list of possible combinations of all nine scripts has been analyzed but the list is not included in the LGR proposal. |
| NBGP Response | No action required. |
| Comment  | 6.4.2, “NBGP concludes …”: Given the weak analysis above, it’s hard to believe what NBGP concludes now. |
| NBGP Analysis | The extensive list of possible combination was analyzed. It is noted due to the high numbers of cross-script variant could over produce variants labels, however such cases are considered as acceptable. |
| NBGP Response | No action required. |
| Comment  | 7: A comprehensible pattern for other reviewers to refer to: `C[M][B|X] | V[B|X] | CH` (consonant clusters analyzed as a consonat preceded by one or more `CH` occurences). |
| NBGP Analysis | The rules given in Section 7 have been specifically made simple to be “comprehensible” even to a non-technical user. |
| NBGP Response | No action required. |
| Comment  | 7, Rule 5: Inappropriate and over-restrictive rule. See my comment above for §6.2. |
| NBGP Analysis | The NBGP had discussed about Rule 5 and concluded it is needed to be restricted. |
| NBGP Response | No action required. |
| Comment  | 7, Rule 6: Unecessarily restrictive rule. “… perceptually dissimilar but phonetically and semantically similarity between the two labels” is enough for allowing such usage. NBGP doesn’t have the right to force the public to abandon preferred spelling conventions. |
| NBGP Analysis | For Rule 6, there could be cases involving multi-word domains where V may need to be allowed to follow an H. This is the case where two different words are joined together but first of which ends with a Halant and the second word begins with a Vowel. The lack of space/hyphen/joiner forces some unavoidable constraint in readability. NBGP decided to disallowing H following V. |
| NBGP Response | No action required. |