

Neo-Brahmi Generation Panel:

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

Revision: June 30, 2019

Neo-Brahmi Generation Panel (NBGP) published the Devanagari script LGR Proposal for the Root Zone for [public comment](#) on 27 July 2018. This document is an additional document of the public comment [report](#), collecting all comments and NBGP analyses as well as the concluded responses.

There are 5 (five) comment analyses as follow:

No.	1	From	Goyal, mitsu.in
Subject	Comments Devanagari Scripts		
Comment	<p>Hello Comments-devanagari-gurmukhi-gujarati-scripts-lgr-27jul18,</p> <p>For IDN domain names particularly in Devanagari Scripts (Hindi), sometime speaking Urdu language became part of Devanagari script, It creates big issue when we issue phonetically similar domain names , I am giving you the example of .BHARAT IDN :</p> <p>Two exactly similar domain names (Visually and Phonetically) are issued by .Bharat Registry :</p> <p>न्यूज़.भारत (XN--81BXV0F8B.XN--H2BRJ9C)</p> <p>न्यूज़.भारत (XN--81BXV7C2A8D.XN--H2BRJ9C)</p> <p>According to me this kind of issue needs a greater attention.</p>		
NBGP Analysis	<p>Devanagari Team acknowledges the point raised in the comment. The issue was part of the deliberations of the NBGP. All those pairs which have been permitted to form a Consonant+Nukta combinations have been mentioned in the Appendix A of the document. It is expected that the "String Similarity Assessment Panel" ensures that such confusingly similar TLDs do not co-exist in the Root Zone. This case of similar akshars was not made part of the normative section of the LGR as they are merely confusingly similar and that does not figure in into the definition of a "Variant". However, Devanagari Team has duly noted them in the Appendix.</p>		

NBGP Response	No action required.
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No.	2	From	Dinesh Ghimire NPI Corporation
Subject	very good		
Comment	<p>Hello,</p> <p>We got your updates regarding the scripts. Its very grateful to do that. Devanagari scripts have many language including Nepali and Hindi. We hope it will be done by the time.</p> <p>Thank you & best regards,</p>		
NBGP Analysis	Devanagari Team acknowledges the comments. Yes, Devanagari includes many languages and to the maximum extent possible, they were included in the analysis (including Hindi and Nepali).		
NBGP Response	No action required.		

No.	3	From	Vivekananda Pani, Reverie Language Technologies
Subject	Neo Brahmi panel		
Comment	<p>PFA in the doc file, my comments. I find the work done so far, absolutely commendable and by far, one of the best in many years and is worth getting extended to general guidelines for Indic language use in computing. So, I urge the panel of experts to continue this good work and extend the guidelines beyond the scope of LGR.</p>		
Sub Comment	<p>-- <i>In attachment</i> ---</p> <p>Suggestions for LGR</p> <p>I have gone through the supporting documents for LGR Proposal. I have not just learnt about Indic computing from the basics of the principles followed in the start, but also seen through the complete evolution of standards to this time. I must congratulate this “particular” effort whole heartedly. The document is not just very well done, but also covers the most useful aspects. Though it is guided by the need for LGR, this seems to be the first such work “after” the initial standardization work for Indian</p>		

	<p>languages done nearly four decades ago. The authors and contributors deserve due honor.</p> <p>Given the above, I will urge the effort be extended not just to LGR for Indic computing in general. Since the panel exists as such a useful and active group right now, extending the work seriously across Indic computing will make it a lot more useful and serve the purpose for which the effort on IDN in Indian languages has been started.</p> <p>Below are some of the inputs I observe. I am commenting only on section 3 which is the actual recommending section and not getting into the rest.</p>
NBGP Analysis	The actual normative sections are 5.1, 5.2, 5.3, 6.1, 6.2, 6.4, 6.5 and Section 7. Section 3 is only descriptive.
NBGP Response	No action required.
Sub Comment 1	In 3.3.2, the additional mention “after” the first three sentences, are not important. It may add needless confusion.
NBGP Analysis	That part is required to justify why the notion of conjunct depth is not enforced in the normative WLE section.
NBGP Response	No action required.
Sub Comment 2	3.3.3 mentions mentions two vowels U+090D/ U+0972 as same with a note as Marathi uses ँ (U+0972) instead of ऄ (U+090D). This violates the unambiguity guideline for LGR. Also, this is a significant deviation for the nature of the script definition and is also a reason that generates strong debates why Assamese and Bangla are to be considered different scripts. The fundamental reason is that Indic scripts being phonetic, there are no two characters in a script that will be identified as representing the same identity in any language using the same script. In this particular case, the above confusion carries no basis. The vowel in context here has been created for phonetic representation of pronunciations for English words. These vowels are not taught in the native alphabet in schools. Since the character definition has never officially evolved (except perhaps in encodings), the confusion mentioned here is only a debate in pockets. Students of these languages have not natively been taught and a standardisation can actually remove this confusion and have students learn only one form and the usage will also have a uniform practice. This

	<p>will also remove ambiguity within the script. In fact, seeing through a lot of Hindi corpus (the language perhaps most used with Devanagari script) does not show the use of अँ (U+0972) or ऐँ (U+090D). The matra form is seen for some English words though. Perhaps the character finds two encodings within Unicode due to lack of clarity and that standardising the visual form for only one encoding will be the answer. LGR may use only ऐँ (U+090D) and state that the form used could be अँ since the use of ऐँ is not seen. In fact. The character ऐँ was encoded in ISCII (The first encoding standard for Indic scripts) and the experts who developed the standard, had Marathi experts who actually introduced the vowels ऐँ and अँ and hadn't suggested a अँ. More than 3 decades ago, ऐँ was not used in any mainstream Hindi (either officially or unofficially) and English words needing the pronunciation for words like "bat" and "ball", wrote (and still do in most places) as बैट and बाल.</p>
<p>NBGP Analysis</p>	<p>The case of अँ (U+0972) and ऐँ (U+090D) is definitely tricky but it does not violate the unambiguity guideline for the LGR. The language communities using them i.e. Marathi and Hindi in this case are exclusive and clear in the usage of the two. It is rightly stated in the feedback though that these initially were not taught in the school and have been adopted in the languages just to facilitate the loaned words sounds. However, that fact does not make them less of a candidates from being included in the LGR. They are being used and that is what matters in this case.</p> <p>As far as excluding one in favour of the other is concerned, that may not be a wise idea as the language communities using the same are quite possessive about the specific shape both the characters provide to their respective languages. Yes, ideally the shape part of it should have been handled at the font level and the same conceptual character should not have been encoded twice with different shape. However, that is the reality of today and we cannot do much about it. If we disallow, one of the character in the hope that other shape be enabled with the font, that is too big a shift we expect to happen. Even if we keep long-term expectation, the other encoded character will stay and the users still can use it, bringing in the inconsistencies in the data. To sum up, the current state in which two characters with different shapes cater to the requirements of the community, is a workable solution and we should continue with it.</p>
<p>NBGP Response</p>	<p>No action required.</p>
<p>Sub Comment 3</p>	<p>3.3.4 may need more definition at least for normalisation. The variant guideline clearly demands that if two valid forms may exist, they will have to be normalised. While the definition in this section states the use of</p>

	Anusvara with respect to the varga consonants, it doesn't define the same for the rest. Will कंस, कन्स and कम्स be variants of the same or different?
NBGP Analysis	Since this is not the normative part of the document, the text in the section 3.3.4 is not (and nor supposed to be) comprehensive. It is meant to give user an idea about the usage of the Anusvara. As far as making them the variants is concerned, as rightly stated in the comment, there could be different variants possibilities for the same word depending on the user perception. This process thus cannot be algorithmically and definitively handled, which is a must for variant identification under this process. Hence such cases are not considered for the Variant recommendation. Also, as the spellings of the two words are totally different (visually as well as in storage), this is a similar case as that of color and colour, which are not considered as variants even in the latin script.
NBGP Response	No action required.
Sub Comment 4	3.3.5 mentions that present day Hindi users tend to replace this with anusvara. I am not sure if this is a factor. The different between हँस (laugh) and हंस(swan) is not disambiguated by such a rule. I suggest the second sentence be removed. People may make common errors in spellings and that happens in every language but that must not become a norm.
NBGP Analysis	This section is not normative and is only meant to describe the current usage pattern. This does not make it a norm.
NBGP Response	No action required.
Sub Comment 5	My personal suggestion is to disallow Nukta. Nukta is "not" a character nor does it create or identify a new character. Nukta is an accent marker. There are no two words that differ only by the nukta and have the same meaning. The word nukta itself was borrowed from Urdu where it is used as an accent marker. In Indian languages, wherever it is used, it only appeared under ङ and ञ wherever the pronunciation for these consonants were flowing than stern. But, the nukta never participates in any conjunct. Use of this in regular text is for a visual representation for accent marking but is ignored in computing and words written with or without nukta carry the same status. Considering the unambiguity need in IDNs, the use of Nukta may not be permitted. But, if the committee experts decide to permit use of Nukta, then the indiscriminate joining of

	Nukta with any consonant or vowel may not be allowed. Only the valid lists may be outlined.
NBGP Analysis	<p>The Nukta character is in quite widespread usage and those who need to write it, need it for clear reasons which are based on the intended phonetic sounds. Disallowing Nukta will disenfranchise a large user community from representing the TLD labels they may intend to write. Nukta is also used in Santali with certain vowels and vowel signs. Whether it should be called a character or a combining mark is a question of terminology and has no bearing on this body of work directly or indirectly. The statement “Use of this in regular text is for a visual representation for accent marking but is ignored in computing and words written with or without nukta carry the same status” appears to be a personal opinion which should not have been generalized. There are many aware implementations which treat the two cases quite differently.</p> <p>As suggested in the comment, the Nukta has already been constrained to come after certain set of consonants, vowels and vowel signs and is not available in the free-form.</p>
NBGP Response	No action required.
Sub Comment 6	<p>I am very pleased that NBGP experts have discouraged the use of ZWJ.</p> <p>It does appear that the use of ZWNJ cannot be avoided. MSR doesn't permit the use of ZWNJ. But, this is due to a fundamental issue with encoding. As defined in 3.3.2, Halant is the implicit vowel (schwa) remover. But, Halant is “not” a joiner. Hence, most of the Indian languages have many words that are written with halant but do not end up forming conjuncts. To form conjuncts, students of these languages learn about joining (yukta). Ideally in encoding, these two characters should have had such nomenclature so that Indian users can associate with the way they have learnt their languages. I am not sure if NBGP has the scope to influence this, but looking at the work, my expectation is certainly towards the same. Halant must not behave as a joiner and must remain visually explicit. For joining, the joiner may be used and the character be called as Yukta. This suggestion should ideally go to the Unicode consortium, but since this also relates to the behavior of halanta, I am not in a position to make it. ZWJ and ZWNJ are not characters nor are character operators. Hence, use or non-use of these are unclear and debated.</p>
NBGP Analysis	As rightly noted in the comment, the issue of ZWJ and ZWNJ is not within the scope of this work. The discussion about the proposed “yukta” character may also need to be taken up on a different forum.

NBGP Response	No action required.
Sub Comment 7	In section 5.2, what is the difference between U0912 and U094A? U094A is mis-represented. Should be the matra form.
NBGP Analysis	This is a mistake that needs to be corrected in the LGR. We thank the commenter from bringing this to our notice.
NBGP Response	094A character in the table in 5.2 needs to be changed to “ॊ” and the corresponding character name needs to be changed to “DEVANAGARI VOWEL SIGN SHORT O”.
Sub Comment 8	Section 5.2, the note for table 7 refers to footnote 13. The footnote explains that the use of U0931 is only for a display variant. This is in line with the actual language use. The languages Marathi, Konkani and Nepali do not have a ra-dot (RRA) as in U0931 and hence, is not taught as a part of the language. However, the conjunct with some consonants do take the display form of eyelash reph. It is a legacy from ISCII where technology was limiting the computing systems of those times to have different display forms in different languages for the same conjuncts. This is not different from the alternate conjunct forms and lead to ambiguity in use. To remove ambiguity, the use of RRA may not be permitted. In case the panel experts decide otherwise, then it must be stated clearly that use of RRA is only for a display variant so that IDN normalizing for search etc. can follow the same guideline.
NBGP Analysis	<p>The statement “However, the conjunct with some consonants do take the display form of eyelash reph.” is not clearly understood. Assuming that it means: there are some cases of conjuncts other than those mentioned in Table 7 which take the display form of eyelash reph. This is clearly a case of erroneous font design does not directly affect the recommendations made here. Imposition of the Akshar formation rules strictly puts restrictions on the possible character combinations thereby limiting the scope of shape (not artistically but in general) analysis to only valid akshar formation cases. As given in Table 7, the 0931 is already restricted to the specific combinations, hence it need not be removed from the code-point repertoire.</p> <p>Stating that RRA is only used for display variant in this body of work would have no bearing on the IDNs and their associated search normalizations. That is a different aspect which can be dealt with at the search engine level and not here.</p>

NBGP Response	No action required.
Sub Comment 9	Section 5. I suggested that use of nukta be avoided. However, if that be permitted, the list of Nukta consonants must be mentioned in this section (5.5.4) to make it explicit. Also, I presume this section only attempts to mention the validity of character sequence. Though such validity “is” dependent on the akshar definition, but emphatic mention about akshar, number of consonants that can join etc. are perhaps extra information and will needlessly raise confusion and questions. These definitely have a very important need if the document will also be referred for display implementation (fonts and fonts rendering). Unless such is an intention, the additional information may be removed.
NBGP Analysis	<p>The list of valid Nukta preceding characters is given in the normative Section 7, WLE 1. The section 5.5.4 focuses on the akshar rule formation aspect of it only and hence is silent about it.</p> <p>The entire aim of the Section 5.5 is to provide the reader with a perspective about how Indian language Akshar formation works without the constraints that the LGR procedure puts on it. Hence the additional information given is intended and required.</p>
NBGP Response	No action required.
Sub Comment 10	The sections after that reiterate or elaborate about halant and nukta which will probably get revised only based on adoption of the above suggestions.
NBGP Analysis	As adoption of the above suggestions do not yield into any revisions, there are no changes foreseen in this section.
NBGP Response	No action required.
Ending Remark	I will re-emphasise my appreciation to this work and suggest that this be extended to Indic computing in general. This guidelines for LGR are not necessarily minimalist but are very practical and if extended to Indic computing in general, will make the growth of Indian languages use, easier and faster. If the NBGP panel of experts may agree to shoulder such a responsibility to take this amazing effort beyond LGR, then this may also include font definition formats. The most prevalent font format today is OpenType which has very complex tables and font designers find it very hard to understand and create new fonts. This is supported by the fact that the number of fonts and designs that grew before OpenType

	<p>became the only supported format on Windows and later other OS, dropped drastically to very few options. Language use and publishing will not grow without good fonts and development of fonts is restricted by the complicated font format and lack of definitions and standard. Also, the OpenType definition works over glyphs only. Hence, the character classification as outlined in this document in section 3 and script grammar as outlined in section 5.5 are critical parts to the display behavior for Indic scripts and hence, OpenType rendering engines pose limitations.</p>
NBGP Response	<p>The Devanagari Team humbly acknowledges the appreciation extended towards this work. As ICANN is one of the most open organizations in terms of it's working, it is assumed that this document will continue to be in the open domain and be useful to the discussions within the community.</p>

No.	4	From	Asmus Freytag, Integration Panel
Subject	Integration Panel Comment on Devanagari LGR		
Comment	<p>For Comment on Devanagari LGR</p> <p>In reviewing the draft LGR for Bengali, the IP noted that the NeoB GP has opted to not include the VISARGA as a variant between these two scripts. However the Bengali VISARGA is not listed in Appendix B of the Devanagari LGR proposal, while VISARGAs for other scripts are listed.</p> <p>This make the intent of the NeoB GP with relation to the Devanagari vs. Bengali VISARGA somewhat ambiguous.</p> <p>Because Bengali and Devanagari share at least one consonant variant, the Bengali VISARGA could be used to form labels that are only distinct by the small difference in shape between the two VISARGAs (two closed vs. two open circles). If the GP asserts that this distinction is enough to prevent the kind of security issues normally addressed by variants, then this should be documented, perhaps by including the Bengali VISARGA in Appendix B. Otherwise, if the GP feels on review, that this code point represents a security issue, it could be added back to the list of cross-script variants.</p>		

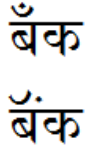
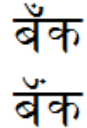
	The IP would like to encourage the NeoB GP to review the issue and to make the appropriate modifications to the documentation or specification of the Devanagari LGR (and to ensure that the Bengali LGR is matches when finalized).
NBGP Analysis	It was discussed between the Devanagari and Bengali Team members that the distinction between the respective Visargas is enough in order not to get them included in the normative section. However, the same can be added to the Appendix B as suggested.
NBGP Response	Adding the Devanagari and Bengali Visarga pair to Appendix B as possible confusables.
Ending Remark	The IP notes that the GP very properly does not consider cross-script variants for cases where only combining marks have a shared form.
NBGP Analysis	Yes, the GP has decided not to include those cases as they cannot form valid labels.
NBGP Response	The Devanagari Team does not see the need to change anything in the document. However, if the IP would advise so, the same can be clearly stated in the document.

No.	5	From	Liang Hai
Subject	A quick review of the Devanagari proposal		
Comment	§2, “Latin transliteration of native script name: dévanâgarî”: Use a consistent transliteration scheme throughout the document.		
NBGP Analysis	The document uses the spelling “Devanagari” throughout the document except in the said location where exact latin transliteration is intended. As the accent markers may not be present on most of the user’s keyboards, that could have posed problems in terms of searching, hence, exact latin transliteration was not used elsewhere.		
NBGP Response	No action required.		
Comment	§3.3.1, footnote 5: “/a/ would be misunderstood” only because the authors don’t try to use consistent transliterations.		
NBGP Analysis	Non-specific remark.		

NBGP Response	No action required.
Comment	§3.3.2, “However, the notion of maximum number of consonants joining to form one akshar is empirical”: Good. Such sensible statements are rarely seen.
NBGP Analysis	The comment is noted.
NBGP Response	No action required.
Comment	§3.3.3, Table 5: The vowel set seems sketchy. It doesn’t make sense to include letter and sign of vocalic rr but exclude vocalic l and ll. It doesn’t make sense to include letters and signs of oe, ooe, aw, ue, and uue (presumably all for Kashmiri), but exclude short e and short o (which are also required by Kashmiri).
NBGP Analysis	It does not make sense either to include everything known to the mankind in the descriptive (non-normative) section of the document. However, the Devanagari team would understand the random names mentioned with “short e” and “short o” as "DEVANAGARI LETTER SHORT E" and "DEVANAGARI LETTER SHORT O" respectively and would add the same alongwith the respective vowel signs to the Table 5.
NBGP Response	Addition of "DEVANAGARI LETTER SHORT E" and "DEVANAGARI LETTER SHORT O" along with the respective vowel signs to the Table 5.
Comment	§3.3.4: A typical confusion between the grapheme bindi and the phoneme anusvara (note the grapheme bindu/anusvara often represents a phonetic nasalization/anunasika in Hindi, but is encoded as bindu) when trying to introduce seemingly-well-understood orthography but not understanding the context of discussing text encoding. Over-emphasis of certain languages and writing systems’ orthography features. In this document’s concern, bindu/anusvara is just a sign representing certain nasal feature.
NBGP Analysis	In general and non-specific remark.
NBGP Response	No action required.
Comment	§3.3.6, “... to represent sounds found only in words borrowed from Perso-Arabic”: Not true. Nukta is used for sounds (including languages’ native sounds, including loanword sounds from Perso-Arabic, English, etc,

	origins) that can't be represented by the original set of graphemes in Devanagari. If the authors can't figure out a good summary for a section at the beginning, the section should start with an introductory sentence "Something has following functions:" then.
NBGP Analysis	In general and non-specific remark given without specific examples.
NBGP Response	No action required.
Comment	§3.3.6, "बढ़ /bədʱ/": Use a decent transliteration or phonetic transcription.
NBGP Analysis	The transcription to the best of the ability of the authors was used. The remark is moot without the specifics.
NBGP Response	No action required.
Comment	§3.3.8, "Earlier the ZWJ was recommended ... However, with the new recommendations in place, this usage of ZWJ is now not encouraged.": Unclear where this observation comes from. The Unicode Standard Core Specification currently doesn't state a preference between the two encodings.
NBGP Analysis	<p>This section of document describes in general, the state of affairs in the usage of the Indian languages on digital platforms. It is not a legal document and should not be read as such. Also, there are linguistic bodies and the community other than the Unicode Consortium which can lead the discourse and set in place the expectations regarding which is an encouraged practice and which is not.</p> <p>Having said that, the Unicode Consortium, in it's Chapter 12 (in R5a) (http://www.unicode.org/versions/Unicode11.0.0/ch12.pdf) clearly mentions that the mechanism of Ra+Halanta+ZWJ to generate eyelash ra is for "For compatibility with The Unicode Standard, Version 2.0". Before that (in R5), it is clearly mentioned that it is to be formed with Rra+Halant. It is left up to the scholarly wisdom of the commenter to understand whether this practice is "encouraged" or needs to be there only for compatibility purposes.</p>
NBGP Response	No action required.
Comment	§4.1.2.4: Make §3.3.3, Table 5 consistent with this consideration and §5.2. Authors seem to have a hard time figuring out how to deal with the

	duplicated information between §3.3 and §4/§5. I suggest §3.3 should only include encoding-ignorant information.
NBGP Analysis	It should have been understood before making this comment that the points 3.3.3, 4.1.2.4 and 5.2 are meant to convey totally different informations and are in no way meant to be “duplicate”.
NBGP Response	No action required.
Comment	§5.2, Table 6: Should note the “Indic syllabic category” column is not about the Unicode character property of the same name.
NBGP Analysis	The Devanagari Team would change the same if the IP is of the same opinion.
NBGP Response	Update the text to ‘Category’
Comment	§5.2, Table 6, row 67: Wrong glyph and name.
NBGP Analysis	Same as pointed out by Mr. Pani in his review and will be changed.
NBGP Response	To be changed to correct glyph and the character name.
Comment	§5.5, “... in the form of variables”: These are not variables but notation.
NBGP Analysis	A variable is something which acts as a placeholder for multiple entities with the same properties as intended by the creator of the variable. The entities mentioned are also being viewed as such. The Devanagari Team does not see the need to change as suggested.
NBGP Response	No action required.
Comment	§6, “There are no characters/character sequences in Devanagari which can be created by using the characters permitted as per the [MSR] and that look exactly alike.”: Not true. First, WLE is also required to prevent confusables (eg, vowel letter aa vs <vowel letter a, vowel sign aa>). Also, even with the WLE, the case of anusvara following a candra shape (part of vowel letters candra e, candra a, and candra o, as well as vowel signs candra e and candra o) should be examined, eg, Marathi बँक (bank) and Hindi हाँग काँग (Hong Kong) can be encoded with either candrabindu or <vowel sign candra e / vowel sign candra o, anusvara> and rendered the

	same in major fonts (and actually the latter encoding might be semantically preferred by many users, thus might even lead to a “allocatable” disposition).
NBGP Analysis	<p>The Variants discussion cannot be seen in isolation from presence of WLE rules, at least in the context of this document. Thus, the instance mentioned i.e. vowel aa vs <vowel letter a, vowel sign aa> cannot be formed given the WLE recommendation. The text beginning with the section 6 however can be modified to clearly state the conformance to the WLE rules.</p> <p>The other point related to candrabindu looking similar to <vowel sign candra e / vowel sign candra o, anusvara> is based on bad font design and there are fonts which can render the same correctly e.g.</p> <p>1.The word bank as rendered in the C-DAC GIST Dhruv Font</p> <p style="text-align: center;">  </p> <p>2. The word bank as rendered in the C-DAC GIST Dhruv Font</p> <p style="text-align: center;">  </p> <p>Top word in both the cases is formed using Candrabindu and the bottom one is formed using Candra E + Anusvara</p> <p>However, the Devanagari Team would agree that some fonts can render the same exactly alike. This can be discussed within the NBGP and if found worth, can be added to either the normative or the confusables part of the document.</p>
NBGP Response	On discussions within the NBGP, the case of Candrabindu vs Candra E+Anusvara can be added to the Devanagari LGR document.
Comment	§6.1, Table 16: Glyphs should be manually drawn to better illustrate the proper rendering.
NBGP Analysis	The glyphs can be shown with proper rendering by editing and putting up as image.
NBGP Response	To be properly shown by using edited image instead of the actual characters.

Comment	§6.4: Just a feeling, the disposition of “blocked” might be too restrictive.
NBGP Analysis	Given the fact that this specification deals with the root zone, the restrictiveness is intended.
NBGP Response	No action required.
Comment	§6.5, Table 19: Variants between Devanagari and Bengali don’t seem even close to being as complete as the Gurmukhi ones. Where is Bengali candrabindu, nukta, vowel sign aa, vowel sign ii, vowel sign u, virama, and certain consonant letters?
NBGP Analysis	The said cross-script confusables were finalized based on the consensual discussion with the Devanagari and the Bengali teams. The mentioned characters were examined and ruled out from being considered confusables.
NBGP Response	No action required.
Comment	§7: A comprehensible pattern for other reviewers’ reference: `C[N][M[N]][B D X] V[N][B D X] C[N]H`
NBGP Analysis	The Authors of this document are well versed with the ISCII standard and the C-DAC GIST IDN Policy documents from where this comprehensible pattern is taken and suggested. The Section 7 is meant to be simplified version of the same with additional bounds that the LGR procedure puts. The rules given in Section 7 have been specifically made simple to be “comprehensible” even to a non-technical user. It is unfortunate that the commenter could not “comprehend” the same.
NBGP Response	No action required.
Comment	§7, Case of Eyelash Reph: Unclear what the reason 2 means.
NBGP Analysis	This is a technical point which can be difficult to understand for the naive readers. This point tries to give reason why the term “S” which is defined for eyelash-reph (in the beginning of Section 7) not used anywhere in the specific WLE rules. It goes on to elaborate that the last characters of the Eyelash-reph sequences i.e. Eyelash Reph Ya and Eyelash Reph Ha, being consonants, all the rules applicable to consonants automatically get applicable to the “S”. Hence no specific mention of the same.

NBGP Response	No action required.
Comment	§7, Case of V preceded by H: This is too restrictive.
NBGP Analysis	Given the fact that this specification deals with the root zone, the restrictiveness is intended.
NBGP Response	No action required.