I. General comments:

- Thanks to the ISO 7098 WG for making the revision of the 2nd edition of ISO 7098 published in 1991. The revised draft mandates most of the practices we currently follow, especially adding transliteration rules for personal and place names. It will enhance global information exchange in a data linking environment. The Council on East Asian Libraries (CEAL) supports ISO’s endeavor in this revision.
- The CEAL would also like to express some concerns and suggestions about ISO rules specified below. We hope ISO considers CEAL members’ suggestions. CEAL members deal with Romanization issues on a daily basis. Their application of Romanization and syllable aggregation guidelines are made in dealing with real life situations. Decisions need not only adhere to principles and guidelines, but are generally made in consideration of the user and orderliness in large databases (such as LC and OCLC).

In summary, the CEAL would like to recommend ALA to vote “yes” with conditions that the concerns for the following specific rules are to be addressed and revised accordingly.

II. Comments regarding specific rules:

<table>
<thead>
<tr>
<th>Rules #</th>
<th>Location (within the Rule identified at left) of ISO/CE 7098 Draft Text underlined and CEAL Comments/Concerns</th>
<th>CEAL Proposed Revision underlined and Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>11.1</td>
<td>ISO/CD 7098</td>
<td>CEAL Proposed Revision: Chinese personal names are to be written separately with the surname first, followed by the given name written as one word, with the initial letters of both capitalized. The traditional compound...</td>
</tr>
</tbody>
</table>
traditional compound surnames are to be written together without a hyphen. **The double two-character surnames are to be written together with a hyphen** and the initial letters of both capitalized. Pen names and other aliases are to be treated in the same manner.

EXAMPLE 4 **Zhang-Wang** Shufang (张王淑芳)

**CEAL Comments/Concerns:**
- We have concerns about hyphenated practice for double surnames. True double surnames should not be hyphenated. In addition, since not all such names following hyphenated practice have different results with indexing, searching, and retrieving of bibliographic data, and may subsequently become an issue for linking bibliographic data from different systems globally.
- Since double surnames can be two-character or multi-character, we suggest removing “two-character” and adding an example of a double surnames with more than two-character, e.g., 项司徒文良.

11.2 **ISO/CD 7098**

The surname, given name, seniority order after the adjuncts “Lao”, “Xiao”, “Da”, “A” are to be written separately and with the initial letter both capitalized.

EXAMPLE 1 Xiao Liu (小刘, younger Liu)

CEAL Proposed Revision: Only removed Example 3 and renumber examples as follows:

The surname, given name, seniority order after the adjuncts “Lao”, “Xiao”, “Da”, “A” are to be written separately and with the initial letter both capitalized.
| EXAMPLE 2 Lao Qian (老钱, older Qian) | EXAMPLE 1 Xiao Liu (小刘, younger Liu) |
| EXAMPLE 3 Lao Zhang tour (老张头儿, older Zhang) | EXAMPLE 2 Lao Qian (老钱, older Qian) |
| EXAMPLE 4 Da Li (大李, older Li) | EXAMPLE 3 Da Li (大李, older Li) |
| EXAMPLE 5 A Niu (阿牛, A Niu) | EXAMPLE 4 A Niu (阿牛, A Niu) |

**CEAL Comments/Concerns:**

Example 3 introduces the syllable aggregation rule about 儿化音, i.e., connecting other character(s) with “r” when “儿” serve as a suffix. This instruction is not stated in ISO/CD 7098. This is a particular spoken feature and cannot be differentiated by machine transliteration. It could cause confusion and inconsistent practice among countries that don’t apply the Basic rules of the Chinese phonetic alphabet orthography as a whole.

**Reasons:**

- Removing the example 3 would not cause confusion in understanding the instruction 11.2.
- It provides flexibility and leeway for each country on whether they want to apply the syllable aggregation rule about connecting other character(s) with “r” when “儿” serves as a suffix.
- It could be difficult and confusing to differentiate when to apply “r” or “er” for “儿” in the situation of a machine conversion and/or for non-native Chinese speakers.
- Not all readers, Chinese and Western alike, fully understand the 儿化 practice in Chinese linguistics. For machine processing and consistency 头 and 儿 are treated as two words -- thus, 老张头儿 Lao Zhang tou er.
- For countries that apply this rule, they can always refer to rules referenced in 11.12.
- For countries that don’t apply this syllable aggregation rule for “儿”, it won’t cause inconsistent practice within a country.
- A side note: "tour" happens to be the same as an English word. It might confuse English speakers.

### 11.4 ISO/CD 7098

Chinese place names should separate the geographical proper name from the geographical feature name and

### CEAL Proposed Revision:

Chinese place names should separate the geographical proper name from the names of jurisdiction or the geographical feature name.
| CEAL Comments/Concerns: | \* Provide explicit instruction for clarification on jurisdiction and the syllable aggregation rules for place names. 
\* Add more examples for place names with names of jurisdiction for clarification. 
\* Help to make a reference between 11.8 and 11.4. |
<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td><strong>EXAMPLE 1</strong> Beijing Shi (北京市, Beijing Municipality) <strong>EXAMPLE 2</strong> Hebei Sheng (河北省, Hebei Province) <strong>EXAMPLE 3</strong> Yalu Jiang (鸭绿江, Yalu River) <strong>EXAMPLE 4</strong> Tai Shan (泰山, Tai Shan Mountain) <strong>EXAMPLE 5</strong> Dongting Hu (洞庭湖, Dongting Lake) <strong>EXAMPLE 6</strong> Taiwan Haixia (台湾海峡, Taiwan Straits) <strong>EXAMPLE 3</strong> Xikou Zhen (溪口镇, Xikou town) <strong>EXAMPLE 4</strong> Shenzhen Tequ (深圳特区, Shenzhen Special Economic Zone) <strong>EXAMPLE 5</strong> Qujiatun Cun (瞿家屯村, Qujiatun village) (Renumber the rest of examples, example 3-6)</td>
<td></td>
</tr>
<tr>
<td>The multi-character geographical proper names, names of jurisdiction, or geographical feature names are written together as one word. The first letter of each element should be capitalized.</td>
<td></td>
</tr>
<tr>
<td><strong>CEAL Proposed Revision:</strong> Split 11.6 into 11.6 and 11.7, renumber the rest of rule number.</td>
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<tr>
<td><strong>11.6 ISO/CD 7098</strong></td>
<td>The names of smaller villages and towns and other place names in which it is not necessary to distinguish between the proper place name and the geographical feature name are to be written together as one unit.</td>
</tr>
<tr>
<td><strong>EXAMPLE 1</strong> Wangcun (王村, Wang Village) <strong>EXAMPLE 1</strong> Zhoukoudian (周口店, an historical site) <strong>EXAMPLE 2</strong> Santanyinyue (三潭印月, a scenic spot) <strong>EXAMPLE 3</strong> Heilongjiang (黑龙江[省], Province Heilongjiang) <strong>EXAMPLE 1</strong> Zhoukoudian (周口店, an historical site) <strong>EXAMPLE 2</strong> Santanyinyue (三潭印月, a scenic spot) <strong>EXAMPLE 3</strong> Heilongjiang (黑龙江[省], Province Heilongjiang)</td>
<td></td>
</tr>
<tr>
<td><strong>CEAL Proposed Revision:</strong> If Chinese place names do not contain character(s) of geographical feature or jurisdiction, write them as one word.</td>
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</tr>
<tr>
<td>**11.7 If Chinese place name in which character(s) of geographical feature or jurisdiction become part of proper nouns, write them together as one word. If in doubt, write separately as instructed in 11.4.</td>
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</tbody>
</table>
CEAL Comments/Concerns:

- This instruction is difficult to follow consistently because it calls for judgment calls which vary among individuals. It is not clear how small a place has to be in order to be eligible for this rule to apply.
- For examples of names listed that do not contain any character(s) of geographical feature or jurisdiction, it lacks clear instruction. We suggest splitting the instruction into two, in order to address two different situations separately for clarification.
- It has been using “one word” referring to syllable aggregation through this standard, while using “one unit” in this rule, should it be consistent by using “one word”?

EXAMPLE 1 Wangcun (王村[镇], Wangcun Village, “cun” is part of the proper noun)
EXAMPLE 2 Wenjiashi (文家市[镇], Town Wenjiashi, “shi” is part of the proper noun)
EXAMPLE 3 Heilongjiang (黑龙江[省], Province Heilongjiang, “jiang” is part of proper noun)

Reasons:

- It is unclear to users of this standard how to determine when a village or town is small enough to apply this standard. The size of a village or town can change, while an established place name may stay the same for much longer time.
- Provide separate instruction to differentiate two different situations according to GB/T 16159-2012 汉语拼音正词法基本规则 6.2.2.3:
  - Clarify the instruction for names that are only proper nouns without containing any character(s) of geographical feature or jurisdiction. 不需区分专名和通名的地名, 各音节连写.
  - Clarify the instruction by limiting it only to characters of geographic features and jurisdictions as part of proper nouns of place names. 已专名化的地方名不再区分专名和通名, 各音节连写. Also according to Spelling Rules for Chinese Geographical Place Names (the part of Chinese Geographical Names), 1984
- Add explanatory note at the end of examples for clarification.
- Revised instruction and separate/renumber examples will help reduce the level of potential confusion and inconsistent practice.
### 11.7 ISO/CD 7098

In accordance with the principle of adhering to the original, non-Chinese personal names and place names are to be written in their original Roman (Latin) spelling. While personal names and place names from non-romanized scripts are to be spelled according to the rules for Romanization for that language. For reference, Chinese characters or their Hanyu Pinyin equivalent may be noted after the original name. **Under certain conditions, the Hanyu Pinyin may precede or replace the original spelling.**

**EXAMPLE 1** Marx (马克思, Makesi)
**EXAMPLE 2** Darwin (达尔文, Da'erwen)
**EXAMPLE 3** Newton (牛顿, Niudun)
**EXAMPLE 4** Einstein (爱因斯坦, Aiyinsitan)
**EXAMPLE 5** Akutagawa Ryunosuke (芥川龙之介, Jiechuan Longzhijie)
**EXAMPLE 6** Ngapoi Ngawang Jigme (阿沛•阿旺晋美, Apei Awangjinmei)
**EXAMPLE 7** Ulanhu (乌兰夫, Wulanfu)
**EXAMPLE 8** Paris (巴黎, Bali)
**EXAMPLE 9** New York (纽约, Niuyue)
**EXAMPLE 10** Tokyo (东京, Dongjing)
**EXAMPLE 11** Ürümqi (乌鲁木齐, Wulumuqi)

### CEAL Proposed Revision: Renumber as 11.8.

**11.8** Non-Chinese personal names and place names written in Chinese are to be spelled according to their Chinese pronunciation. For reference, the original name or commonly known Roman (Latin) spelling, if known, may be noted after the romanization.

**EXAMPLE 1** Makesi or Makesi (马克思) for 马克思
**EXAMPLE 2** Daerwen or Daerwen (Darwin) for 达尔文
**EXAMPLE 3** Niudun or Niudun (Newton) for 牛顿
**EXAMPLE 4** Aiyinsitan or Aiyinsitan (Einstein) for 爱因斯坦
**EXAMPLE 5** Jiechuan Longzhijie or Jiechuan Longzhijie (Akutagawa Ryunosuke) for 芥川龙之介
**EXAMPLE 6** Apei Awangjinmei or Apei Awangjinmei (Ngapoi Ngawang Jigme) for 阿沛•阿旺晋美
**EXAMPLE 7** Wulanfu or Wulanfu (Ulanhu) for 乌兰夫
**EXAMPLE 8** Bali or Bali (Paris) for 巴黎
**EXAMPLE 9** Niuyue or Niuyue (New York) for 纽约
**EXAMPLE 10** Dongjing or Dongjing (Tokyo) for 东京
**EXAMPLE 11** Wulumuqi or Wulumuqi (Ürümqi) for 乌鲁木齐

### Reasons:
- By definition, transliterations should always match the characters they transiterate. If the original name or commonly known Roman (Latin) spelling is desirable for clarification, it can be provided in parentheses.
- In recording bibliographic data, transcribe/transliterate information as it appears; no research is needed to find the original name, therefore more user friendly; the original name can be provided for access points with non-original
This instruction is not practical and will result in inconsistent practice.
- It’s better not making a conditional instruction on when to use pinyin and when to use original form. It may create confusion and/or barrier to users’ bibliographic search.
- Example for 达尔文’s transliteration has no need for apostrophe according to Pinyin rule.

<table>
<thead>
<tr>
<th>11.8</th>
<th>ISO/CD 7098</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Transcribed names which have already become Chinese words are to be spelled according to their Chinese pronunciation.</strong></td>
<td></td>
</tr>
<tr>
<td>EXAMPLE 1 Feizhou (非洲, Africa)</td>
<td></td>
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<tr>
<td>EXAMPLE 2 Nanmei (南美, South America)</td>
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</tr>
<tr>
<td>EXAMPLE 3 Deguo (德国, Germany)</td>
<td></td>
</tr>
<tr>
<td>EXAMPLE 4 Dongnanya (东南亚, Southeast Asia)</td>
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</tbody>
</table>

**CEAL Comments/Concerns:**
According to the instruction, these names should follow 11.4, but examples imply otherwise.

<table>
<thead>
<tr>
<th>11.9</th>
<th>CEAL Proposed Revision: Renumber as 11.9.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>11.9 Transcribed non-Chinese place names which have already become Chinese words (i.e., those names not resulted from direct transliteration) should be romanized in the same way as Chinese place names as instructed in 11.4.</strong></td>
<td></td>
</tr>
<tr>
<td>EXAMPLE 1 Deguo (德国, Germany)</td>
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<tr>
<td>EXAMPLE 2 Fei Zhou (非洲, Africa)</td>
<td></td>
</tr>
<tr>
<td>EXAMPLE 3 Nan Mei (南美, South America)</td>
<td></td>
</tr>
<tr>
<td>EXAMPLE 4 Dong Nan Ya (东南亚, Southeast Asia)</td>
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</tr>
</tbody>
</table>

**Reasons:**
- For clarification, modify the instruction by applying ISO/CD 7098 11.4 consistently.
- Making a “see” reference between 11.8 (the special rule for geographic features that have become part of Chinese names) and 11.4 (the general rule for Chinese place names) would be better than the current version.
- Avoid confusion also in interpreting what “have already become Chinese words.”
- Re-arrange the examples in a logical order, i.e. move Deguo form as a variant.
- GB/T 16159-2012 汉语拼音正词法基本规则 6.2.3 非汉语人名, 地名的汉字名称, 用汉语拼音拼写. Wulanfu (乌兰夫) Makesi (马克思).
Appendix: Charges and membership of the Working Group (approved by CEAL EB, Oct. 7, 2013)

CTP-CCM Joint Working Group on ISO 7098 Romanization of Chinese

Charges:

- Review the draft revision of ISO 7098 in comparison with the ALA-LC Romanization Table for Chinese.
- Gather additional input from interested CEAL members.
- Prepare final set of suggestions and obtain approval from the CEAL Executive Board.
- Send official CEAL response to NISO via ALA.

Members:

Shi Deng, Chair (UC San Diego)
Vickie Doll (U. Kansas)
Sarah Elman (Columbia)
T.J. Kao (Yale)
Dongyun Ni (U. Hawai‘i)
Ming-sun Poon (LC)
Jia Xu (U. Iowa)
Susan Xue (UC Berkeley)

Term: one month or up to six months if needed.