AT-LARGE ADVISORY COMMITTEE
Comment on the String Similarity Review Guidelines

The At-Large Advisory Committee (ALAC) appreciates the opportunity to provide comments on the String Similarity Review Guidelines, which is a matter of significant interest to end-users.

ALAC Support of the String Similarity Review Guidelines

The ALAC has had various concerns regarding potential conflicts between new gTLD names, and commends the authors for addressing many of them in the proposed guidelines.

The ALAC does, however, have one significant remaining concern: Underlining. Many commonly used word processing software products (for example Microsoft Word and Adobe Acrobat), as well as many common web browsers (for example Google Chrome, Microsoft Bing, and Mozilla Firefox) automatically flag domain names by a) changing the font color of the domain name, and b) underlining the domain name. The former is not a problem, but the latter can cause confusion.

For example, one of the hundreds of languages which use the Latin script (Nuer) uses the Letter **O** with Combining Macron Below (o̱ Unicode U+006F U+0331), which is therefore included in the repertoire. Readers who are not acquainted with Nuer are unlikely to even realize that such a symbol exists, and therefore are unlikely to even look for it. Thus, when they encounter **example.o̱oo**, they are unlikely to realize that the first symbol in the **.o̱oo** TLD is not the Letter **O**, and thus this is not the existing .ooo TLD.

There can also be confusion of even very common letters, such as the Latin small letter G (g in the sans serif fonts) vs the Latin small letter Q (q): consider underlining vs underlininq.

This potential for confusion is not unique to the Latin script. For example, the Devanagari letter A (अ U+0905) and the Devanagari letter Ue (◻ U+0976) are readily

distinguishable to someone familiar with languages using the Devanagari script. But they become indistinguishable when an underline covers the line below.

We therefore suggest that consideration for confusion due to underlining be added to the considerations used in the String Similarity Review.

The ALAC looks forward to the next version of the document, which we hope will also include more details on the mechanics of how the automated and manual similarity reviews will be carried out.

Ratification Record

On 07 February 2024, the Public Comment proceeding opened for the String Similarity Review Guidelines. On 13 February 2024, an At-Large workspace was created for their Public Comment submission. The At-Large Consolidated Policy Working Group (CPWG) decided it would be in the interest of end users to develop and submit an ALAC statement for this Public Comment proceeding. Bill Jouris and Alan Greenberg volunteered to draft the ALAC statement.

On 13 March 2024, Bill Jouris and Alan Greenberg submitted initial comments for the ALAC statement, which was discussed during the 13 March 2024 CPWG call. On 14 March 2024, the draft statement was circulated with the At-Large community for review and input.

On 3 April 2024, Bill Jouris and Alan Greenberg finalized the At-Large Public Comment Statement. The ALAC Chair, Jonathan Zuck, requested that the ALAC ratify the Public Comment Statement before submission to the ICANN Public Comment feature.

On 5 April 2024, staff confirmed the online vote resulted in the ALAC endorsing the statement with 15 out of 15 votes in favor. 0 votes against, and 0 abstentions. Please note 100% of ALAC members participated in the poll. The ALAC members who participated in the poll are (alphabetical order by first name): Aziz Hilali, Bill Jouris, Bukola Oronti, Claire Craig, Eduardo Diaz, Joanna Kulesza, Jonathan Zuck, Justine Chew, Lilian Ivette De Luque, Marcelo Rodriguez, Pari Esfandiari, Raihanath Gbadamassi, Satish Babu, Shah Zahidur Rahman, and Tommi Karttaavi. You may view the results here: https://tally.icann.org/cgi/results?e=2a9bbff86b1.