

Identification of specific areas for additional review and additional work on IDN ccTLD overall proposed policy

Reference Document (“Document” in the table below): Board Report – IDN ccNSO Policy Development Process, Sep 2013 (https://ccnso.icann.org/sites/default/files/filefield_41859/idn-ccpdp-board-26sep13-en.pdf)

In accordance with its terms of Reference the review team has conducted a high level review of the proposed overall policy for the selection of IDNccTLD strings and inclusion of IDNccTLD in the ccNSO.

The recommendations of the review team are:

1. That the ccNSO Council launches a new ccNSO PDP in accordance with Annex B of the ICANN Bylaws, to address a limited set of issues identified. In some areas a more detailed approach is proposed (confusing similarity review and variant management)
2. After consulting the ccTLD community, propose to the ICANN Board of Directors a change to Article 10 of the ICANN Bylaws to enable the inclusion of IDN ccTLDs in the ccNSO in the manner foreseen in 2013. The RT notes that the proposed ccNSO membership definition will need to be reviewed and updated to address the issue identified by the ccPDP 2 retirement WG and the ccNSO Council.

The RT has been meeting every week since its creation and has consulted ccTLD managers present at the ccNSO members meeting in Marrakesh (ICANN65).

2.1.1 Overall Principles

Section in Document	Topic	Comment/Rationale for review/inclusion in list	Proposed next step
2.1.1 (l)	Association of the (IDN) country code Top Level Domain with a territory. Under the current policy for the delegation of (ASCII) ccTLDs, the two letter ASCII codes associated with the territories listed in the ISO 3166--1 standard are eligible for delegation as a ccTLD. Only the territories listed in ISO3166-1 shall be eligible to select IDN ccTLD strings	<i>Ensure consistency with the delegation procedure for ASCII ccTLDs.</i> <i>Maintain basic principle that “IANA (ICANN) is not in the process to determine what is and what is not a country”.</i> No review needed.	No review needed.

2.1.1 (III)	Preserve security, stability and interoperability of the DNS. To the extent different, additional rules are implemented for IDN ccTLDs these rules should [...].	<i>As the DNS must remain unique and stable, ICANN must ensure full consistency of rules across all TLDs when it comes to their delegation.</i>	No review needed.
2.1.1 (V)	Criteria determine the number of IDN ccTLDs. The criteria to select the IDN ccTLD string should determine the number of eligible IDN ccTLDs per Territory, not an arbitrarily set number	<i>Any criteria for the selection of an IDN ccTLD must be based on the link between the IDN ccTLD and the Territory for which it is proposed.</i> <i>Agreed: the criteria are defined in section 2.1.2</i>	No review needed.

2.1.2 Criteria for the selection of an IDN ccTLD String

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2.1.2 C	<p>The IDN ccTLD string must be a Meaningful Representation of the name of a Territory. The principle underlying the representation of Territories in two letter (ASCII) code elements is the visual association between the names of Territories (in English or French, or sometimes in another language) and their corresponding code elements. The principle of association between the IDN country code string and the name of a Territory should be maintained. A selected IDN ccTLD string must be a meaningful representation of the name of the Territory. A country code string is considered meaningful if it is:</p> <p>a)The name of the Territory; or b)Part of the name of the Territory that denotes the Territory; or c) A short form designation for the name of the Territory, recognizably denoting the name.</p>	<p><i>ICANN must ensure consistency between the policy to assign an ASCII ccTLD and an IDN ccTLD. In detail, the “meaningful representation” criteria should be crystal clear when it comes to territories that have multiple, official languages.</i></p> <p><i>To what extent does the selected IDN ccTLD string need to be (remain?) to be recognised as a ccTLD even if you do not know the language?</i></p>	<p>The criteria need to be reviewed in depth in PDP.</p> <p>Rationale: Proposed criteria have been adopted by the ccNSO Members in 2013. They are very similar to the criteria used in the Fast Track Process.</p>
2.1.2 E	<p>If the selected string is not the long or short form of the name of a Territory then evidence of meaningfulness is required.</p> <p>Where the selected string is the long or short form name of the relevant Territory in the Designated Language as listed in the UNGEGN Manual, Part Three column 3 or 4 version 2007, or later versions of that list it is considered to be meaningful.</p> <p>Where the selected string is not listed in the UNGEGN then meaningfulness must be adequately documented [...].</p>	<p><i>ICANN must make the “meaningfulness” criteria crystal clear as in the past ICANN had inconsistent approaches for the evaluation of the “adequate documentation”. This applies also to the case when one territory has more than one designated language.</i></p> <p><i>Furthermore, the procedure should foresee an appeal step in case the selected string is not accepted because of not being “meaningful”.</i></p>	<p>The criteria need to be reviewed in depth in PDP.</p> <p>Rationale: Proposed criteria have been adopted by the ccNSO Members in 2013. They are very similar to the criteria used in the Fast Track Process.</p>

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2.1.2 F	<p>Only one (1) IDN ccTLD string per Designated Language. In the event that there is more than one Designated Language in the Territory, one (1) unique IDN ccTLD for each Designated Language may be selected, provided the meaningful representation in one Designated Language cannot be confused with an existing IDN ccTLD string for that Territory. Where a language is expressed in more than one script in a territory, then it is permissible to have one string per script, although the multiple strings are in the same language.</p> <p>Notes and Comments It should be noted that other requirements relating to non-confusability are applicable and should be considered, including the specific procedural rules and conditions for cases when the same manager will operate two or more (IDN) ccTLDs which are considered to be confusingly similar.</p>	<p><i>It is recommendable that any future IDN ccTLD policy addresses carefully – and with the support of linguist experts – the option of languages that are expressed in more than one script as well as the rules to be produced in case the same registry manages the ccTLD in ASCII and its variant in other script. At present, ICANN approach is not consistent and that may jeopardise the ultimate goal of ensuring the security and stability of the DNS.</i></p> <p><i>For example simplified Chinese and Mandarin</i></p>	<p>The criteria need to be reviewed in depth in PDP and if deemed appropriate reconfirmed.</p> <p>Rationale: Proposed criteria have been adopted by the ccNSO Members in 2013. They are very similar to the criteria used in the Fast Track Process.</p>
2.1.2 G	<p>The selected IDN ccTLD string should be non--contentious within the territory. The selected IDN ccTLD string must be non--contentious within the territory. This is evidenced by support/endorsement from the Significantly Interested Parties (relevant stakeholders) in the territory. Concurrent requests for two strings in the same language and for the same territory will be considered competing requests and therefore to be contentious in territory. This needs to be resolved in territory, before any further steps are taken in the selection process.</p>	<p><i>ICANN must make sure there is consistency between the delegation of an ASCII ccTLD and an IDN ccTLD. Therefore, contentious requests should be resolved in the territory.</i></p>	<p>Ensure application of basic principle that IDN ccTLD and ASCII ccTLD should be treated similar</p>
2.1.2 I	<p>Confusing similarity of IDN ccTLD Strings.</p>	<p><i>As there is only one DNS environment and as domain name end-</i></p>	<p>The confusing similarity review procedures need to be reviewed</p>

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		<p><i>users/registrants are the same customers all over the internet eco-system – and has such have the same rights, the element of possible confusing similarity between an applied-for TLD must be treated by ICANN the same way, independently from being a cc, g or an IDN TLD. This will ensure that the current discriminatory rules for the evaluation of IDN ccTLDs are modified and consequently, become in line with the provisions that are currently in place in other TLD environments. Those considerations apply also to the steps detailed under 2.1.3 “Procedures and Documentation”.</i></p>	<p>in depth. Needs to be done under a ccNSO PDP and if feasible the ccNSO will need to coordinate with the GNSO work in this area.</p> <p>Mechanism to coordinate is through a coordination committee/working party. This model is light weight, without the baggage of a Cross-community working group. The results will feed into each of the PDPs</p> <p>Membership is from the ccNSO PDP and GNSO PDP WG membership with membership open to interested groups.</p> <p>Before becoming part of the ccNSO PDP WG proposals the results need to be accepted by the membership of the ccNSO PDP WG</p> <p>Once included in the total package it shall be treated in same manner as other proposals (subject to Council and Membership adoption).</p>

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			<p>Rationale: Confusing similarity review is currently part of both of IDN ccTLD and new gTLD processes and policy proposals. Over time the methods, criteria and procedures have evolved and diverged.</p> <p>The ccNSO Proposals are part of the original recommended policy and need to be updated through a ccNSO PDP.</p>
2.1.2 (F)	Where a language is expressed in more than one script in a territory, then it is permissible to have one string per script, although the multiple strings are in the same language.	<p>Mixing between scripts within the same label should be restricted in case of letters have different contexts “RTL or LTR”</p> <p>Note that in principle registration policies are a local matter. That being said advising not to allow mixed scripting could be an option.</p>	<p>The criteria need to be reviewed in depth in PDP and if deemed appropriate reconfirmed.</p> <p>Rationale: Proposed criteria have been adopted by the ccNSO Membership in 2013. They are very similar to the criteria used in the Fast Track Process.</p>

2.1.3 Procedure and Documentation

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2.1.3 - 2	<p>IDN Table</p> <p>The IDN Table may already exist i.e. has been prepared for another IDN ccTLD or gTLD using the same script and already included in the IANA IDN Practices Repository. In this case the existing and recorded IDN Table may be used by reference.</p>	<p><i>Using the IDN Table prepared for another IDN cc or gTLD could be an option under specific conditions.</i></p> <p>When recommendation was developed Variant Management was not taken into consideration.</p> <p>Going forward it is clearly a topic that will need to be addressed and should be taken into consideration</p>	<p><i>Variant Management and RZ-Label Generation rules and related work on IDN Tables should be reviewed and included in the update of the ccNSO Policy. Work to be undertaken as (part of) ccNSO PDP.</i></p> <p><i>Rationale: In current proposal</i></p>
2.1.3 - 2	<p>Documentation of required endorsement / support for selected string by Significantly Interested Parties</p>	<p><i>In the Fast Track Process and underlying methodology the reference is to Local Internet Community, which was in use up- and until the Framework of Interpretation was adopted and implemented. Going forward the terminology should be used consistently across different ccTLD related policies.</i></p> <p><i>Ensure required documentation and terminology is used consistently across the ccTLD related policy documentation (RFC 1591& related Framework of Interpretation, ccPDP 3 and overall policy for selection of IDN ccTLD strings.</i></p>	<p>Review and update the current proposed policy to ensure consistent documentation and terminology.</p>

2.1.3 - 2	<p>Classification of input For procedural purposes the following cases should be distinguished [...].</p> <p>Notes and Comments In case where additional documentation is required:</p> <ul style="list-style-type: none"> - Unanimity should NOT be required. - The process should allow minorities to express a concern i.e. should not be used against legitimate concerns of minorities - The process should not allow a small group to unduly delay the selection process. 	<i>To be consistent with previously stated procedures, any issue must be sorted within the territory.</i>	<i>Review the clarifications provided in the text of ccPDP 2. Ensure consistency and clear basis for interpretation.</i>
2.1.3.2	<p>Stage 2 Validation of IDN ccTLD string To validate a selected string is not confusingly similar, ICANN should appoint an external and independent “ Similarity Review Panel” to review the selected IDN ccTLD string for confusing similarity.</p>	What will happen if the selected string has variances? Are all of the variances accepted or is only one accepted?	See next steps re: variance emangement
2.1.3	Stage 1 <u>Documentation Designated Language</u>	Should the documentation submitted to ICANN be written in English or could be written with the requested IDN string?	<p>The criteria need to be reviewed in depth in PDP.</p> <p>Rationale: Proposed criteria have been adopted by the ccNSO Members in 2013.</p>
2.1.3	stage2 in the “ <u>3. Validation of selected string</u> ”	<p>Should the selected string (U-label) not show any confusion with previous approved (U-labels)?</p> <p>The confusing similarity review procedures should be reviewed and updated</p>	See above with respect to section 2.1.2 I of proposed policy.

2.1.4 Section Miscellaneous Policy Proposals

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2.1.4 C	<p>Creation of list over time</p> <p>Experience has shown that entries on the ISO 3166-1 table change over time. Such a change can directly impact the eligibility for an IDN ccTLD. In order to record these changes, it is recommended that a table will be created over time of validated IDN ccTLDs, its variants and the name of the territory in the Designated Language(s), both in the official and short form, in combination with the two--letter code and other relevant entries on the ISO 3166-1 list. The purpose of creating and maintaining such a table is to maintain an authoritative record of all relevant characteristics relating to the selected string and act appropriately if one of the characteristics changes over time.</p>	<p><i>The update frequency caused issues in the past. It might be advisable to review it.</i></p> <p>It is questionable whether this mechanism still makes sense in the current context. Who is responsible for creating the table and what is the frequency for updating it? What is purpose?</p>	<p>Review and update/amend this section of the proposed policy as part of a ccNSO PDP.</p> <p>Rationale: This element of the policy needs to be reviewed but was included at the suggestion of some GAC members at the time and adopted by the ccNSO members in 2013. Needs to be ensured that both GAC (members) and ccNSO Membership are able to express their views formerly.</p>
2.1.4 E	<p>Review of policy for the selection of IDN ccTLD strings</p> <p>It is recommended that the policy will be reviewed within five years after implementation or at such an earlier time warranted by extraordinary circumstances [...].</p>	<p><i>It would be advisable to review the policy whenever deemed appropriate.</i></p> <p><i>Considering the dynamic internet landscape, should any significant scenario change and/or arise, it would be quite challenging to wait 5 years to review the policy.</i></p> <p>Is review warranted every 5 years?</p>	<p>Review and update/amend this section of the proposed policy as part of a ccNSO PDP.</p> <p>Rationale: Adopted by the ccNSO Members in 2013.</p>

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		<p>What should be the scope of such a review? Should timing be better defined?.</p> <p>is that a normal behaviour in any ICANN policy or it is a new mechanism for IDN policy, if it is specific to IDN 5 years may be too long, especially in the beginning</p>	
2.1.4 G	<p>Permanent IDN ccTLD Advisory Panel Due to the complex nature of IDN's and the sensitivities and interest involved in the selection of IDN ccTLD strings, it is recommended that under the overall policy a Permanent IDN ccTLD Advisory Panel is appointed to assist and provide guidance to ICANN staff and the Board on the interpretation of the overall policy in the event the overall policy does not provide sufficient guidance and/or the impact of the policy is considered to be unreasonable or unfair for a particular class of cases. [...].</p>	<p><i>An advisory panel might have a role if it is made of true IDN experts within and outside the ICANN constituency community. Considering how challenging this could be, it would be recommendable to seek alternative channels to advise on possible issues and changes relating to the policy.</i></p> <p>Current practice around implementation includes public comments etc. In addition creating such a permanent advisory panel, could be prove not to be feasible in light of current workload and</p>	<p>Review and update/amend this section of the proposed policy as part of a ccNSO PDP.</p>

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		priorities of the ccNSO and other communities	

Section 2.2 Proposals on the inclusion of IDN ccTLD in the ccNSO

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2.2 D	Voting	<p>It is necessary to distinguish the case when IDN ccTLD and ccTLD managed by the same Registry (manager). Is it necessary in this case to include this IDN ccTLD as an individual member of ccNSO?</p> <p>Voting by emissary is limited to formal votes enumerated in Article 10 (was Article IX) of the ccNSO: see page 27 Board report)</p>	<p>No need to update or review the proposed changes to ICANN Bylaws. Only need to adopt numbering.</p> <p>In general: section 2.2 could be separated from proposal and send to the Board as proposed change to the Bylaws.</p>
2.2 A	Membership definition	<p>It is recommended that the definition in Article IX section 4.1 (new Article 10) is updated to maintain the one-to- one correspondence between the IANA Root Zone Database and membership in the ccNSO.</p> <p>The term “later variants” in the Bylaw definition refers to the heading “ccTLD Manager” (previously Sponsoring Organisation). This used to be “sponsoring organization”</p> <p>For example:</p> <p>Delegation Record for .AC</p> <p>(Country-code top-level domain)</p>	<p>Proposed Membership definition does not need to be updates for purposes of inclusion of IDNccTLDs in the ccNSO.</p> <p>However should be updated to address concerns identified through ccNSO PDP 3, resulting from the latest Bylaw update of the definition in 2016.</p>

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		<p>ccTLD Manager</p> <p>Network Information Center (AC Domain Registry)</p> <p>Administrative Contact</p> <p>Internet Manager Network Information Center (AC Domain Registry)</p> <p>Technical Contact</p> <p>Administrator ICB Plc.</p>	
2.2.C	Initiation of PDP	<p>The members of the ccNSO may call for the creation of an Issue Report by an affirmative vote of at least ten members of the ccNSO representing at least ten different Territories present at any meeting or voting by e-- mail.”</p> <p>Although questioned the rationale is one vote per territory.</p>	No need for additional review

Other topics

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NA	Variant management	<p><i>The element of “variant management” has become quite relevant in the overall IDN environment. Therefore, it is recommendable that any IDN string selection process takes it into account.</i></p>	<p>Needs to be included in proposed policy. It is suggested to launch a ccNSO PDP. The 2013 IDN ccTLD proposals includes a placeholder with the understanding at the time that further work needed to be done.</p> <p>Further, at hter euquest of the ICANN Board of Directors the ccNSO will need to coordinate with the GNSO work in this area.</p> <p>Mechanism to coordinate is through a coordination committee/working party. This model is light weight, without the baggage of a Cross-community working group. The results will feed into each of the PDPs</p> <p>Membership is from the ccNSO PDP and GNSO PDP WG membership with</p>

			<p>membership open to interested groups.</p> <p>Before becoming part of the ccNSO PDP WG proposals the results need to be accepted by the membership of the ccNSO PDP WG</p> <p>Once included in the total package it shall be treated in same manner as other proposals (subject to Council and Membership adoption).</p>
NA	Retirement of IDN ccTLD	<p>The retirement of ASCII ccTLD is triggered by the removal of the country code form the ISO 3166-1 list. This may be caused by a significant change of name of the country or territory, which results in a need to change the two-letter code and removal of the former. Looking at the selection criteria, the question is which, if any, of the listed criteria, may/should cause the retirement of an IDN ccTLD, and cause the retirement policy to become applicable.</p>	<p>The ccNSO PDP on IDN ccTLD should be amended to include what will cause the retirement of an IDN ccTLD.</p> <p>Rationale: The retirement process will be defined through ccNSO PDP 3 will be applicable to both IDNccTLD and ASCII ccTLDs.</p> <p>The event leading up to the retirement of ASCII ccTLD is derived from RFC 1591</p>

			<p>(removal of the country code from the ISO 3166-1 list of country & territory names). The overall policy on the selection of IDN ccTLD strings includes the criteria for selection of an IDNccTLD string. The delegation, transfer and revocation are defined through RFC 1591 and interpreted through the FoI are applicable by the overall principles.</p>
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