



UPDATE & CONSULTATION ON New gTLD Subsequent Procedures

INTERNATIONALIZED DOMAIN NAMES (IDNs)

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SNAPSHOT OF KEY ELEMENTS

Internationalized Domain Names (IDNs)



ALAC STATEMENTS touched on:

- IDNs as an integral part of the New gTLD Program
- Compliance with LGRs as LGRs are recommended manner in which IDN TLDs and variants are identified
- 1-Unicode character gTLDs for script/language combinations where a character is an ideograph or ideogram
- Implementation Guidance: automate compliance to IDNA2008 and applicable LGRs
- Implementation Guidance: Pre-Delegation Testing for applicants of IDN TLDs
- IDN variant allocation
- Bundling of SL IDN variants



RELATED SubPro Areas/Topics include:

- Root Zone Label Generation Rules (LGRs)
- IDNA2008 (RFCs 5890-5895) or its successors



COMPETITION, CONSUMER CHOICE & TRUST (CCT) RECOMMENDATIONS

- None

❖ SubPro WG deliberations on public comments to Initial Report on topic of IDNs is targeted for 27 Aug 2019

SNAPSHOT OF SUBPRO WG DELIBERATIONS

Internationalized Domain Names (IDNs) as at 26 Aug 2019

Compliance with LGRs

ALAC STATEMENTS support:

- For IDNs to continue as integral part of Program
- Requiring compliance with Root Zone Label Generation Rules (LGRs) as the LGRs are the recommended manner in which IDN TLDs and variants are to be identified
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SUBPRO WG Deliberations:

High Level Agreement

- IDNs should continue to be an integral part of the program going forward (as indicated in Principle B of the original Final Report on New gTLDs).
- Compliance with Root Zone Label Generation Rules (RZ-LGR, RZ-LGR-2, and any future RZ-LGR rules sets) should be required for the generation of IDN TLDs and valid variants labels.

SNAPSHOT OF SUBPRO WG DELIBERATIONS

Internationalized Domain Names (IDNs) as at 26 Aug 2019

1-Unicode char gTLDs

ALAC STATEMENTS support:

- Allowance of 1-Unicode character gTLDs for script/language combinations where a character is an ideograph (or ideogram) and do not introduce confusion risks that rise above commonplace similarities, consistent with SSAC and Joint ccNSO-GNSO IDN WG (JIG) reports.
- Also should seek additional inputs from CJK communities on risks to 1-letter IDN labels beyond the technical risks identified by SSAC/JIG

SUBPRO WG Deliberations:

High Level Agreement

- 1-Unicode character gTLDs may be allowed for script/language combinations where a character is an ideograph (or ideogram) and do not introduce confusion risks that rise above commonplace similarities, consistent with SSAC and Joint ccNSO-GNSO IDN Workgroup (JIG) reports.

Additional inputs

- Use of “1-Unicode character” is ambiguous per SAC052, consideration for aligning recommendation with SAC052. Also useful to list ideographs used in many scripts in review scope/process for considering ideographic characters, reference to s. 6 item 6 of SAC052
- High risk of user confusion based on varying deployments of single character ideographic scripts – solution?
- Suggestion for two alternatives to define the universe of eligible single-character IDN TLD labels: i) scripts of the ISO 15924 standard, provided a single character in such script represents an idea, they have Unicode representation, are allowed in IDNA and in RZ-LGR-n. Specifically, the scripts 286, 500, 501 and 502 (Hangul, Han, Simplified Han, Traditional Han) should be allowed, or ii) single characters (i.e. a single code point) whose Unicode Script Property is Hangul or Han, and is allowed in IDNA.

SNAPSHOT OF SUBPRO WG DELIBERATIONS

Internationalized Domain Names (IDNs) as at 26 Aug 2019

Automation, manual validation/invalidation

ALAC STATEMENTS support/state:

- Implementation Guidance: to the extent possible, automation of compliance to IDNA2008 (RFCs 5890-5895) or its successors and applicable RZ-LGRs
- Under the current IDN regime, manual validation/invalidation of any known specific scripts of a proposed IDN TLD is unlikely to occur

SUBPRO WG Deliberations:

High Level Agreement

- To the extent possible, compliance with IDNA2008 (RFCs 5890-5895) or its successor(s) and applicable Root Zone Label Generation Rules (RZ-LGR, RZ-LGR-2, and any future RZ-LGR rules sets) be automated for future applicants.

Outstanding

- Who is responsible for operationalizing automation of RZ-LGRs and that operationalized RZ-LGRs follow specifications -- ICANN or third-party PDT provider?
- While checking against IDNA2008 and RZ-LRGs can be automated, some manual process may be required if there are additional technical requirements – refer to Study on Technical Use of Root Zone Label Generation Rules currently underway
- Re: s.4 RFC 4893 describes some script/language combinations that might have issues with then-applicable RFC 3454 framework, now defined in RFC 82264 (PRECIS). Where allowed by RZ-LRG-n, those are possible candidates for manual analysis.

SNAPSHOT OF SUBPRO WG DELIBERATIONS

Internationalized Domain Names (IDNs) as at 26 Aug 2019

Pre-Delegation Testing (PDT)

ALAC STATEMENTS support:

- Implementation Guidance: Should maintain Pre-Delegation Testing for applicant even if applicant is compliant with IDNA2008 (RFCs 5890-5895) or its successors and applicable LGRs for the scripts it intends to support

Rationale: Pre-Delegation Testing (PDT) covers the testing of different aspects that could potentially impact the stability and manageability of registry operations, such as DNS, WHOIS, EPP, IDN, Data Escrow and Documentation. IDN variants introduce added complexity to registry operations, even where compliant with IDNA2008 or LGRs.

SUBPRO WG Deliberations:

High Level Agreement

- If an applicant is compliant with IDNA2008 (RFCs 5890-5895) or its successor(s) and applicable LGRs for the scripts it intends to support, Pre-Delegation Testing should be unnecessary for the relevant scripts.

Outstanding

- Should be noted that the IDNA2008 standard poses some constraints and itself suggests that it is a baseline measure (necessary but may not be sufficient) and therefore additional constraints should be imposed by the registries. For example, some additional constraints are identified by the IDN Guidelines for the second level labels. Pre-Delegation Testing (PDT) allows for checking for the constraints put by IDNA2008 and additional guidelines (e.g., by reviewing the proposed IDN tables for the second level labels), which is needed to ensure secure and stable implementation of the IDNs

SNAPSHOT OF SUBPRO WG DELIBERATIONS

Internationalized Domain Names (IDNs) as at 26 Aug 2019

IDN Variant TLDs

ALAC STATEMENTS support/state:

- Conservatively, for allowing IDN gTLDs deemed to be variants of already existing or applied-for TLDs where (1) they have the same RO implementing, by force of agreement, a policy of cross-variant TLD bundling and (2) applicable RZLGR is already available at time of application submission
- Belief that IDN variant-related policies on “bundling” are best handled at the TLD-level provided that if both variants are registered, they need to be under the control of the same registrant
- Refer to IDN Variant TLD Implementation Framework recommendations as input

SUBPRO WG Deliberations:

High Level Agreement

- IDN gTLDs deemed to be variants of already existing or applied for TLDs will be allowed provided: (1) they have the same registry operator implementing, by force of written agreement, a policy of cross-variant TLD bundling and (2) The applicable RZ-LGR is already available at the time of application submission.

Outstanding

- Recommendation that text be clarified to state that variant IDN TLDs need to be operated by same backend registry service providers, not just have same RO, not only in the initial delegation/launch but further as a consideration when business transactions impact particular IDN TLDs
- Reference to detailed analysis on IDN Variant TLDs posted at <https://www.icann.org/public-comments/managing-idn-variant-tlds-2018-07-25-en> and the recommendations suggested for adoption
- IDN TLDs which are variants of registered trademarks should be subject to Legal Rights Objections
- Need for coordination with IDN Variant Management Framework

SNAPSHOT OF SUBPRO WG DELIBERATIONS

Internationalized Domain Names (IDNs) as at 26 Aug 2019

Bundling of SL IDN variants

ALAC STATEMENTS state:

- Bundling of SL IDN variants: Suggest that the "Same Entity Constraint" is enforced for all variants, ie all variants are either allocated to the same registrant as the primary label, or blocked. This would require registries (and possibly registrars) to implement the necessary checks during the registration process. Further, registrants may need to be educated about the reasons why such a constraint exists

SUBPRO WG Deliberations:

Outstanding Items – Varying comments

- “The bundling policy at the second level is left to each registry operator, so the best solution, in the view of the target market, can be chosen.
- “Same label under IDN variant TLDs s1.{t1, t1v1, ...} must be registered to the same entity. Second-level variant labels under IDN variant TLDs {s1, s1v1, ...}.{t1, t1v1, ...} must be registered to the same entity. Second-level IDN tables offered under IDN variant TLDs must be harmonized. IDN variant label allocatable or activated under IDN variant TLDs may not necessarily be the same. Existing policies and associated procedures for TLDs must be updated to accommodate the recommendations for IDN variant TLDs. All remaining existing TLD policies must apply to IDN variant TLDs, unless otherwise identified.”
- “Once domain name is effectively allocated all its variants should be blocked, the activation of the variants should be up to the registrants. This leads to more consumer protection and limited confusion.”
- “The problem of “synchronization” of TLDs has been studied previously and it is clear that there are no generally applicable technical approaches that work consistently in the DNS. Informally, the goal of TLD bundling is for domain names that are identical below the level of the bundled TLDs to behave “the same” in all of the contexts in which users might encounter them” – should observe the findings of Registry Services Technical Evaluation Panel (RSTEP) study of the Public Interest Registry (PIR) proposal to bundle .NGO and .ONG