

# At-Large's Subsequent Procedures Scorecard: Internationalized Domain Names (IDNs)

## CPWG SubPro Small Team

- **Post** At-Large Consolidated Policy Working Group (CPWG) Call  
Wednesday, 4 March 2020, 13:00 UTC
- **Post** At-Large IDN Working Group circulation & feedback



**APPLICATION EVALUATION/CRITERIA**

Topic/Area:	<b>[26] INTERNATIONALIZED DOMAIN NAMES (IDN) [2.7.5]</b>			Priority:	<b>HIGH</b>	Settled On:	
Related:	<ul style="list-style-type: none"> <li>IDN Variant TLD Implementation</li> <li>Root Zone Label Generation Rules (RZ-LGRs)</li> <li><b>Risk of DNS Abuse</b></li> <li><b>TO NOTE: GNSO Council has convened scoping team to examine policy implications from IDN Varian TLD Implementation and Final Proposed Draft Version 4.0 of the IDN Implementation Guidelines – after examination, team will accordingly suggest to GNSO Council a mechanism (eg SubPro, new PDP/EPDP, other) to address issues</b></li> </ul>						
Key Issues:	Promotion of IDNs and treatment of IDN variants						
Policy Goals:	Principle B remains applicable, though can be modified slightly to acknowledge IDNs already in the new gTLD space: “Some new gTLDs should be internationalised domain names (IDNs) subject to the approval of IDNs being available in the root.”						
Assigned CCT-RT Rec’s:	None						
References:	<ul style="list-style-type: none"> <li>SubPro WG Application Evaluation/Criteria_Summary Document, 7 January 2020</li> <li><a href="#">01. SubPro IDNs, 26 August 2019</a></li> </ul>						
What has SubPro PDP WG concluded?	<b><u>What will/might SubPro PDP WG recommend?</u></b>	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?				
1. IDNs should continue to be an integral part of the program going forward	<p>Recommendation for intent behind Principle B to remain but per UA:</p> <p><u>Recommendation:</u> WG recommends revising Principle B to read “<i>Some new gTLDs should be IDNs. Applicants should be made aware of UA challenges in ASCII and IDN TLDs. They should be given access to</i></p>	Yes, with suggested amendment that applicants MUST (instead of “should”) be given access to all applicable information about UA etc.					

	<i>all applicable information about UA currently maintained on ICANN's Universal Acceptance Initiative page, through the UASG, as well as future efforts."</i>		
2. Compliance with RZ-LGRs should be required for generation of IDN TLDs and valid variant labels	Compliance with Root Zone Label Generation Rules should be required for generation of IDN TLDs and valid variant labels		
3. 1-Unicode character gTLDs permissible for script/language combinations in specific circumstances	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		
4. Automation of compliance with IDNA2008 and applicable RZ-LGRs desirable	To the extent possible, compliance with IDNA2008 (RFCs 5890-5895) or its successors and applicable RZ-LGRs Rules be automated for future applicants		
5. Whether compliance with IDNA2008 and applicable RZ-LGRs removes need for PDT	Compliance with IDNA2008 and applicable RZ-LGRs for scripts an applicant intends to support, then PDT should be unnecessary for the relevant scripts	Not necessarily. We commented that the prudent path would be to maintain PDT regardless. Because PDF covers testing of aspects that could potentially impact stability and manageability of RO operations – DNS, WHOIS, EPP, IDN, Data	<a href="#">In general, PDT should be required. However, in future, there should be 1 PDT for delegation of all IDN variant TLDs alongside the primary applied-for IDN TLD (i.e. 1 PDT for whatever TLD delegated, IDN or ASCII, with or without IDN Variant</a>

		Escrow and Documentation – and IDN variants introduce added complexity to RO operations even if compliant with IDNA2008 or RZ-LGRs.	TLDs) so as to not discriminate IDN TLDs that need IDN Variant TLDs to best serve users. For already delegated IDN gTLDs, there is value in a simple PDT.
6. Same-entity rule for IDNs and their respective variants	IDN gTLDs deemed to be variants of already existing or applied for TLDs will be allowed provided (1) they have the same RO implementing by force of written agreement, a policy of cross-variant TLD bundling and (2) the applicable RZ-LGR is already available at time of application submission		The “Same Entity Constraint” ought to be enforced for all variants, i.e. all variants to be 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. Registrants may need to be educated about the reasons why such a constraint exists.
What has SubPro PDP WG concluded?	<b><u>What SubPro PDP WG will likely omit?</u></b>	Is this acceptable? If not, why so?	What else needs to be done and by/with whom?
7.			
<u>PENDING ISSUES:</u>	SubPro PDP WG reaction	Anything missing?	What else needs to be done and by/with whom?
8. <u>RZ-LGRs limited to generating IDN variants?</u>	What about when RZ-LGRs are not yet in existence? Should absence lead to variant label being blocked or not allocatable?		Scripts for which RZ-LGRs are not yet in existence need to be blocked or reserved and not be allocated to avoid a situation where another IDN TLD application falls into conflict with the IDN Variant, i.e. there need to be a way to say if a new IDN TLD application arrives, whether it is the primary applied-for TLD string or its

			IDN Variants, they must not conflict with the IDN Variants of the earlier applied for IDN TLD (and its possible IDN Variants)
9. <u>Bundling of SL IDN variants</u>			The appropriate rules for bundling of SL IDN variants are dealt with in the ICANN IDN Implementation Guidelines 4.0, which once adopted as policy, would be incorporated in the RA and RAA. Adopting the updated IDN Implementation Guidelines should provide a stronger framework for SLDs and bundling.
10. <u>Making definition of 1-Unicode character gTLDs more precise</u>			Especially relevant to CJK, should get additional inputs from CKJ communities
11. <u>Coordination with IDN Variant Management Framework</u>		Risk of DNS Abuse addressed?	Reliance on the IDN Variant Management Framework 4.0 is required as a community-coordinated approach to mitigating harm to end-users. Such harm has been seen arising from SLD confusion involving IDN characters which may only be familiar to native users of a script, and exploited maliciously; the eg of “easyjet.com” where the “j” was replaced with the Lithuanian Ogonek. ICANN’s publishing of variant tables (and confusables) whose use in TLDs is restricted could act as a resource for

			any bad actor looking for ways to create SLDs which will confuse users, so care must be taken to address foreseeable harm to end-users.
Position:			

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