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

CPWG SubPro Small Team

- Post At-Large Consolidated Policy Working Group (CPWG) Call Wednesday, 27 May 2020, 19:00 UTC
- Post At-Large IDN Working Group circulation & feedback

APPLICATION EVALUATION/CRITERIA

Topic/Area:	**[26] INTERNATIONALIZED DOMAIN NAMES (IDN) [2.7.5]**	Priority:	**HIGH**	Settled On:	28.05.2020

Related:	• IDN Variant TLD Implementation • Root Zone Label Generation Rules (RZ-LGRs) • <mark>**Risk of DNS Abuse**</mark> • **TO NOTE: GNSO Council has convened scoping team to examine policy implications from IDN Variant 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**
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:	• 02. SubPro IDN – CPWG consensus building, 10 May 2020 • SubPro WG Application Evaluation/Criteria_Summary Document, 7 January 2020 • 01. SubPro IDNs, 26 August 2019

What has SubPro PDP WG concluded?	**What will/might SubPro PDP WG recommend?**	Is this acceptable? What else needs to be done and by/with whom?
1. IDNs should continue to be an integral part of the program going forward	<u>Affirmation (1) with modification</u>: WG affirms Principle B from 2007 policy with amendment, "Internationalised domain name (IDNs) new generic top-level domains should continue to be an integral part of the New gTLD Program." Principle B originally stated, "Some new generic top-level domains should be internationalised domain names (IDNs) subject to the approval of IDNs being available in the root."	Yes.

	<u>WG's Rationale</u> Continued support for IDNs being available in the New gTLD Program. The modification here is merely grammatical to note that IDNs already exist in the DNS.	
2. Compliance with RZ-LGRs should be required for generation of IDN TLDs and valid variant labels. 3. RZ-LGRs limited to generating IDN variants 4. Whether compliance with IDNA2008 and applicable RZ-LGRs removes need for PDT 5. Automation of compliance with IDNA2008 and applicable RZ-LGRs desirable 6. Coordination with IDN Variant Management Framework	<u>Recommendation (2):</u> Compliance with Root Zone Label Generation Rules (RZ-LGR) must be required for the generation of IDN TLDs and variants labels, including the determination of whether the label is blocked or allocatable. <u>Implementation Guidance</u> • 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) should be automated for future applicants. The Working Group recognizes that some instances of manual analysis may be required. • If a script is not yet integrated into the RZ-LGR, applicants should be able to apply for a string in that script, and it should be processed up to but not including contracting <u>WG's Rationale</u> • Understanding that label generation rules provide a consistent and predictable set of permissible code points for IDN TLDs, as well as a mechanism to determine whether there are variant labels (and if so, what they are). • Evaluating all TLDs using Root Zone Label Generation Rules (RZ-LGR) allows for a consistent approach and one that complies with community-driven and community-vetted outcomes. • Further to the purpose of consistency and efficiency, WG welcomes any automation of the RZ-LGR in the evaluation processes, although it recognizes that automation may not be feasible in some circumstances.	Yes.

	• Fully supportive of requiring IDN TLDs to comply with RZ-LGR, it's cognizant that this may impact potential applicants who want to apply for an application in a script that is not yet integrated into the RZ-LGR. • Belief that applicants should be provided the opportunity to apply for a string in a script that is not yet integrated into the RZ-LGR, although it should of course not be delegated until it is compliant – burden in this case is on the applicant, who may have to wait for an indeterminate amount of time but is not aware of any other serious concerns	
7. 1-Unicode character gTLDs permissible for script/language combinations in specific circumstances 8. Making definition of 1-Unicode character gTLDs more precise	Recommendation (3): 1-Unicode character gTLDs may be allowed for limited 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. WG's Rationale • Belief that 1-Unicode character gTLDs should be allowed for limited script/language combinations where a character is an ideograph (or ideogram), in support of choice and innovation, but recognizes that care should be taken in doing so. • Belief that it is appropriate to limit 1-Unicode character gTLDs to only certain scripts and languages, though it does not believe it has the relevant expertise to make this determination. • Would welcome the identification of the limited set of scripts and languages (e.g., during implementation), which will substantially increase the predictability of what will likely still remain a case-by-case, manual process. This conservative approach is consistent with both the SSAC and Joint ccNSO-GNSO IDN Workgroup (JIG) reports.	Yes.
9. Same-entity rule for IDNs and their respective variants	Recommendation (4): IDN gTLDs deemed to be variants of already existing or applied for TLDs will be allowed provided they have the same registry operator [and back-end registry service provider,] implementing by force of written agreement a policy of cross-variant TLD bundling.	IDN-WG Co-Chair Edmon Chung proposed text change to address concern – "The recommendation seems to expect that an IDN Variant TLD go through the same "application process" when in fact

		WG's Rationale • In support of security and stability, and in light of the fact that IDN variants are considered to essentially be identical, WG believes that IDN variant TLDs must be owned and operated by the same Registry Operator. • To the extent that the TLD were to change hands at any point after delegation, the IDN variants TLDs must remain bundled together. Accordingly, IDN variant TLDs should be linked contractually.	any IDN Variant TLD should only be "activated" not "applied for" by the same Registry Operator. This is consistent with how the 2012 round was envisioned and handled. Allowing IDN Variant TLDs to be "applied for" is problematic for the concept of IDN Variants."
10. Bundling of SL IDN variants		Recommendation (5): • A given second-level label under any allocated IDN variant TLD must only be allocated to the same entity/registrant, or else withheld for possible allocation only to that entity (e.g., s1 under {t1, t1v1, …}, e.g., s1.t1 and s1.t1v1). • For second-level IDN variant labels that arise from a registration based on a second-level IDN table, all allocatable IDN variant labels in the set must only be allocated to the same entity or withheld for possible allocation only to that entity (e.g., all allocatable second-level labels {s1, s1v1, …} under all allocated variant TLD labels {t1, t1v1, …}). WG's Rationale • For similar reasons as indicated in rationale 4 (i.e., security and stability, that IDN variants should be considered as identical), WG believes that second-level IDN variants should only be allocated (or reserved for allocation) to the same registrant. • This applies both when it is a certain second-level label under multiple variant IDN TLDs (e.g., s1 under {t1, t1v1, …}, e.g., s1.t1 and s1.t1v1) and variants at the second-level derived from the registry operator's approved IDN table (e.g., all allocatable second-level labels {s1, s1v1, …} under all allocated variant TLD labels {t1, t1v1, …}).	Yes.
Main Positions of Concern:		No major concerns expressed by IDN WG to affirmation / recommendations and implementation guidance, except for Recommendation (4) where increased clarity is required to ward off potential confusion over activation of IDN gTLDs deemed to be variants of already existing or applied for TLDs, as opposed to "availability for application".	

	String confusion at SL
	One issue which may require further consideration under the IDN Variant Management Framework 4.0 is the issue of string confusion with respect to IDN scripts.
	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.