

## **Statement of the Non-Commercial Stakeholders Group on the [Study on Technical Use of Root Zone Label Generation Rules](#)<sup>1</sup>**

The Non-Commercial Stakeholders Group (NCSG) welcomes the opportunity to comment on the scope of work which has been proposed to frame the technical discussion undertaken by the Root Zone Label Generation Rules Study Group (RZ-LGR-SG).

### **About Us**

The NCSG represents the interests of non-commercial domain name registrants and end-users in the formulation of Domain Name System policy within the Generic Names Supporting Organisation. We are proud to have individual and organisational members in over 160 countries, and as a network of academics, Internet end-users, and civil society actors, we represent a broad cross-section of the global Internet community. Since our predecessor's inception in 1999 we have facilitated global academic and civil society engagement in support of ICANN's mission, stimulating an informed citizenry and building their understanding of relevant DNS policy issues.

### **Substantive Comments**

The NCSG thanks the Study Group for preparing the proposed scope of work. We have carefully reviewed this plan and the governing principles, and we wish to express the following comments:

- In relation to question 2, the NCSG is unclear as to whether any matter related to single character IDNs, whether they be strictly technical or not, are within the purview of the work of the Study Group;
- In relation to question 6, the NCSG is of the opinion that the RZ-LGR should be considered as ready to be used in applications once the particular script has been integrated by the integration panel, after the public comment period; and
- In relation to questions 12 and 13, the NCSG believes the procedure used to challenge RZ-LGR calculations, as well as the remedies provided in case of a successful challenge, should mirror what is already done regarding other ICANN services and community processes. This would allow a better management of what the community can expect out of a RZ-LGR process.

As a general comment, the NCSG emphasises that the LGR procedure should always be followed. In addition, as a matter of principle, the NCSG is of the opinion that the definition of admitted variants should be as narrow as possible and the variants management mechanisms as strict as possible, in order to prevent abuses.

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<sup>1</sup> <https://www.icann.org/public-comments/technical-rz-lgr-2018-08-02-en>

Thank you again for your efforts in addressing this important matter, and for inviting our input.