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STATUS: Ratified

AT-LARGE ADVISORY COMMITTEE
ALAC Statement on Reference Label Generation Rulesets (LGRs) for the Second Level

Introduction

On 24 August 2020, Public Comment opened for Reference Label Generation Rulesets (LGRs) for the Second Level. On the same day, an At-Large workspace was created for the statement. The At-Large Consolidated Policy Working Group (CPWG), decided it would be in the interest of end users to develop an ALAC statement on the Public Comment, and Bill Jouris, Individual Unaffiliated Member of the North American Regional At-Large Organization (NARALO), volunteered for the drafting team of the ALAC statement.

On 30 September 2020, Bill Jouris presented to the CPWG on points of consensus. The CPWG provided input on the At-Large points of consensus, and a draft statement was developed.

On 07 October 2020, Bill Jouris shared the first draft of the ALAC statement. ICANN Policy staff in support of the At-Large community posted the draft to its workspace and issued a call for comments on the CPWG and ALAC mailing lists. There were no additional comments from the community, so a final call for comments was issued.

On 07 October 2020, the CPWG decided that the statement could move to the ALAC for ratification before submission to ICANN Public Comment.

On 09 October 2020, Bill Jouris finalized the ALAC statement.

On 09 October 2020, the ALAC Chair, Maureen Hilyard, requested that the statement be ratified by the ALAC.

On 15 October 2020, staff confirmed the online vote resulted in the ALAC endorsing the statement with 15 votes in favor, 0 votes against, and 0 abstentions. Please note 100% (15) of the 15 ALAC Members participated in the poll. Please note 2 ALAC Member votes were added after official poll close. The ALAC Members who participated in the poll are (alphabetical order by first name): Abdulkarim Oloyede, Bastiaan Goslings, Carlos Raul Gutierrez, Dave Kissoondoyal, Holly Raiche, Humberto Carrasco, Javier Rua-Jovet, Joanna Kulesza, Jonathan Zuck, Justine Chew, Marita Moll, Matthias Hudobnik, Maureen Hilyard, Sylvia Herlein Leite, and Tijani Ben Jemaa. You may view the result independently under:
   https://www.bigpulse.com/pollresults?code=1340459RPqHa7whaen8ynxW9jWZ

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The ALAC has four areas of concern with regards to Reference Label Generation Rulesets (LGRs) for the Second Level:

1. First, the document says:

   Where variants are included, their selection is informed by existing registry practice, as well as by the work performed at ICANN on the script LGRs for the Root Zone. Any cross-repertoire (or cross script) variants identified in the Root Zone have been retained here for use in zones that support reference LGRs for more than one script of language.

The ALAC believes that the particular registries whose practices were used should be specified. Also, links should be provided to documentation of the "existing practices" used.

2. Second, the document starts from the work on LGRs for the Root Zone. But for several scripts, the repertoire allowed for the Root Zone is only a subset of the repertoire for the script included in the MSR for use in SLDs. This means that those missing code points were not considered for possible variants by the script Generation Panels. The ALAC believes that all those code points need to be evaluated as well.
3. Third, the criteria used by the Generation Panels are extremely narrow. The rationale for this is that additional cases would be evaluated manually by a Similarity Review Panel. But no such panel is envisioned for SLDs (and, realistically, such manual review is probably not possible for SLDs). Therefore, the ALAC believes that the definition of variants for SLDs needs to be substantially expanded. Otherwise the level of potential confusion, and DNS Abuse, is simply too large.
4. Fourth, the document says that:

   gTLD registry operators may consult these reference LGRs while they design their IDN tables to promote consistency.

Under the standard usage for RFCs, "may" merely gives permission to do something. However, the ALAC believes that, as something that is critical for security and the avoidance of DNS Abuse, blocking variant names should not be optional. Accordingly, the ALAC requests revising the text to read:

   gTLD registry operators will incorporate these reference LGRs when they design their IDN variant tables.