At-Large Comment on
Reference Label Generation Rulesets (LGRs) for the Second Level

At Large has four areas of concern:

First, the document says

> Where variants are included, their selection is informed by existing erxisting 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.

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

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. At Large believes that all those code points need to be evaluated as well.

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, At Large 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.

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, At Large believes that, as something that is critical for security and the avoidance of DNS Abuse, blocking variant names should not be optional. Accordingly, At Large requests revising the text to read

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