

# Policy proposals for IDN ccTLD String Selection Criteria, Requirements and Processes

Version 06 Redline

8 March 2021

## 1. Minimal Number of non-ASCII characters

An IDN country code Top Level Domain must contain at least one (1) non-ASCII character (i.e a character that is not included in ISO/IEC 646 Basic Character Set). To illustrate this criterion: For example, *españa* would qualify under this specific requirement and *italia* would not. Note that *españa* contains at least one (1) non-ASCII character (i.e a character that is not included in ISO/IEC 646 Basic Character Set<sup>1</sup> .

For more formal definitions of these terms, see RFC 5890.

WG discussion

WG preliminary agreed that reference to *españa* is an example and that should be clear from the text.

During first reading it was agreed to strike the reference to [a-z, 0-9].

During first reading it was suggested to strike the reference to U-Label and A-label. Need to be checked when discussing the Technical criteria, if (updated) reference needs to be included in this section.

The original text was: "A different way of expressing this is that the selected IDN ccTLD must be a valid U-Label that can also be expressed as an A-label. It cannot be a NR-LDH Label."

## ~~2. IDN ccTLD only for Territories.~~

~~A TLD string associated with a Territory can only be requested and shall be delegated as IDN country code Top Level Domains if and only if all criteria of this policy for the selection of IDN ccTLD strings and other relevant policies for the delegation of ccTLDs are met.~~

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<sup>1</sup> <https://www.iso.org/standard/4777.html>

1 **WG discussion:**

2 The original section has become superfluous as the definition of Territory and Territories is now included in the principles. The  
3 statement as proposed should be in the principles.  
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6 **3. Meaningfulness Criteria and related process and procedures**

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8 **3.1 The IDN ccTLD string must be a Meaningful Representation of the name of a Territory.** The principle  
9 underlying the representation of **Territories** in two letter (ASCII) **code elements** is the visual association  
10 between the names of **Territories** (in English or French, or sometimes in another language) and their  
11 corresponding **code elements**.

12 The principle of association between the IDN country code string and the name of a **Territory** should be  
13 maintained. A selected IDN ccTLD string must be a meaningful representation of the name of the **Territory**. A  
14 country code string is considered to be a **Meaningful Representation** if it is:

- 15 a) The name of the **Territory**; or  
16 b) Part of the name of the **Territory** that denotes the **Territory**; or  
17 c) A short-form designation for the name of the **Territory**, recognizably denoting the name.

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19 WG Comments and discussions

20 Strike the footnote. Reference included in Terminology document

21 CH, as specific example was discussed as exception to the principle of visual association of the name of the Territory and the code element. Note that  
22 the WG does not go into the merits of the ISO3166/MA decisions.  
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25 **3.2 A Meaningful Representation of the name of the Territory MUST be in a Designated Language of the**  
26 **Territory.** The selected IDN ccTLD string should be a **Meaningful Representation** of the name of the territory in

1 a **Designated Language** of that **Territory**. For this purpose, a **Designated Language**<sup>2</sup> is defined as: a language  
2 that has a legal status in the **Territory** or that serves as a language of administration<sup>3</sup>.

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4 The language is considered to be a **Designated Language** if one or more of the following requirements is/are  
5 met:

- 6 1. The language is listed for the relevant **Territory** as an ISO 639 language in Part Three of the “Technical  
7 Reference Manual for the standardization of Geographical Names”, United Nations Group of Experts on  
8 Geographical Names (the UNGEGN Manual)  
9 (<http://unstats.un.org/unsd/geoinfo/default.htm>).
- 10 2. The language is listed as an administrative language for the relevant **Territory** as defined in section 3.7 of  
11 ISO 3166-1 standard [2020].
- 12 3. The relevant public authority in the **Territory** confirms that the language is used in official communications  
13 of the relevant public authority and serves as a language of administration.

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15 Specific requirements regarding documentation of **Designated Languages** are included in the procedures and  
16 documentation sections (*see below section 3.7, auxiliary numbering*).

## 17 18 Comments WG

19 This section needs to be revisited once the Variant Sub-WG completed its work. The full WG needs to be aware of impact of variants on criteria.

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<sup>2</sup> The limitation to Designated Language is recommended as criteria for reasons of stability of the DNS. According to some statistics currently 6909 living languages are identified. See for example: [http://www.ethnologue.com/ethno\\_docs/distribution.asp?by=area](http://www.ethnologue.com/ethno_docs/distribution.asp?by=area). If one IDN ccTLD would be allowed per territory for every language this would potentially amount to 252\*6909 or approximately 1.7 million IDN ccTLDs

<sup>3</sup> The definition of **Designated Language** is based on: “Glossary of Terms for the Standardization of Geographical Names”, United Nations Group of Experts on Geographic Names, United Nations, New York, 2002 [https://unstats.un.org/unsd/ungegn/pubs/documents/Glossary\\_of\\_terms\\_rev.pdf](https://unstats.un.org/unsd/ungegn/pubs/documents/Glossary_of_terms_rev.pdf). Note that in the Glossary the term “Official Language” is used. Experience has shown that, depending on the specific Territory, “Official Language” has a specific connotation, which sometimes creates confusion with the term “Official Lanaguage” as defined in the Glossary.

1 Should requirement of designation also apply to the script i.e an IDNccTLD string has to be in a Designated Language and Designated Script?  
2 Note that currently neither under the Fast Track Process nor in the 2013 proposed policy there is such requirement of designated script. As a result  
3 if a Designated language is in multiple scripts, they should be granted accordingly. For every language-script combination, you are eligible for 1  
4 string. Only 1 IDN ccTLD string per designated language could be an issue. In Chinese two scripts for same language: traditional chinese script and  
5 simplified script, resulting in two 2 IDN ccTLD strings. See section 3.3  
6

7 What to do with the scripts of different languages that are similar? Arabic, Urdu. to be addressed in our discussions? Note that this was discussed  
8 when the Fast Track process was designed (2007-2008). At that time people agreed that ultimately it is up to the country/territory itself, to  
9 determine the script to be used. There may be cross-border issues, however this principle is at the core of the ccTLDs: what is happening in the  
10 country, determines the outcome of the process. See section 4.1 below: In 2007-2008 this principle is reflected in the required documentation etc.  
11 and was considered paramount with respect to selecting the representation of the name of a country.

12 Unicode also lists scripts it encodes here: <https://www.unicode.org/Public/13.0.0/ucd/Scripts.txt> [unicode.org]  
13

14 **3.3 Only one (1) IDN ccTLD string per Designated Language.** In the event that there is more than one  
15 **Designated Language** in the **Territory**, one (1) unique IDN ccTLD for each **Designated Language** may be  
16 selected, provided the **Meaningful Representation** in one **Designated Language** cannot be confused with an  
17 existing IDN ccTLD string for that **Territory**.  
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19 Where a language is expressed in more than one script in a **Territory**, then it is permissible to have one string  
20 per script, although the multiple strings are in the same language.  
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22 [Placeholder: revisit text on confusing similarity after sub-group has concluded its work]  
23

### 24 *Notes and Comments*

25 It should be noted that other requirements relating to non-confusability are applicable and should be  
26 considered, including the specific procedural rules and conditions for cases when the same manager will  
27 operate two or more (IDN) ccTLD's which are considered to be confusingly similar.  
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WG comments

Notes and comments are not intended to be part of the policy itself. They are intended as a clarification and assist in (future interpretation of the policy itself.

Text on similarity needs to be revisited to avoid misunderstandings. Tone of words used in line 16 -17 above, 19 and 20 and notes and comments not consistent.

Discussion around if a language is expressed in more than one script in a Territory, then permissible to have one string per script, although the multiple strings are in the same language.

Example 1. For the Chinese example. In fast track simplified and traditional Chinese strings are separate, as different scripts, but not as variants.

If considered variants, then special mechanism needs to be introduced to grandfather the existing IDNccTLDs.

Latin generation panel lead. 200 languages, using Latin script. No decision according to languages. Tried to process all languages using specific scripts. Wrote in proposal that the use of language is not important when creating TLDs. Possibility to use a label which means something in a language, but not important to use languages in label definition

Language used in multiple scripts. Use of language may not be “official” in some cases. Any of the scripts in which the language is written? Only in certain scripts? Would there be a limitation on not just the language, but also on scripts?

The gvt decides what represents the country in written. (NOTE: GOVERNMENT DECIDES WHAT IS NAME OF COUNTRY OR TERRITORY)  
There should be another doc defining the country or territory in different scripts. (NOTE 2: ISO 3166 contains names of Territories in French or English, not in a designated language)(NOTE 3: see section 4 below with respect to the support required for the proposed string)

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3 **3.4 If the selected string is not the long or short form of the name of a Territory then evidence of**  
4 **meaningfulness is required.** If the selected IDNccTLD string is the long or short form of the name of the relevant  
5 **Territory in the Designated Language, and is** listed in the UNGEGN Technical Reference Manual for the  
6 Standardization of Geographic Names, Part Three column 3 or 4 version 2007<sup>4</sup>, or a later version of that list, it is  
7 considered to be a **Meaningful Representation**.

8  
9 If the **Meaningful Representation** of the selected string is not listed in the UNGEGN Technical Reference Manual  
10 for the Standardization of Geographic Names, Part Three column 3 or 4 version 2007, or a later version of that  
11 list, then meaningfulness must be adequately documented. Adequate documentation MUST be provided if one  
12 of the following cases applies:

- 13 i The selected IDNccTLD string is not the long or short form name of the **Territory** as included in the  
14 UNGEGN Manual in the **Designated Language**,  
15 or  
16 ii The selected IDNccTLD string is an acronym of the name of the **Territory** in the **Designated Language**  
17 or  
18 iii The selected IDNccTLD string is the name of a **Territory** that does not appear in the UNGEGN Manual,  
19 or  
20 iv The selected IDNccTLD string is in a **Designated Language** that is not included in the UNGEGN Manual.

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22 If such documentation is required, the documentation needs to clearly establish that:

- 23 • The meaning of the selected string in the **Designated Language** and English and  
24 • That the selected string meets the meaningfulness criteria.

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<sup>4</sup> [https://unstats.un.org/unsd/ungegn/pubs/documents/UNGEGN%20tech%20ref%20manual\\_m87\\_combined.pdf](https://unstats.un.org/unsd/ungegn/pubs/documents/UNGEGN%20tech%20ref%20manual_m87_combined.pdf)

1 Specific requirements regarding documentation to demonstrate the **Meaningful Representation** are included in the  
 2 procedures and documentation recommendations (see section 3.5 and 3.7 below).

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Section in Original Document	Topic	Comment/Rationale for review/inclusion in list	Proposed next step	Adjust wording?	Proposed Wording
2.1.2 E	<p><b>If the selected string is not the long or short form of the name of a Territory then evidence of meaningfulness is required.</b></p> <p>Where the selected string is the long or short form name of the relevant Territory in the Designated Language as listed in the UNGEGN Manual, Part Three column 3 or 4 version 2007, or later versions of that list it is considered to be meaningful.</p> <p>Where the selected string is not listed in the UNGEGN then meaningfulness must be adequately documented [...].</p>	<p>ICANN must make the “meaningfulness” criteria crystal clear as in the past ICANN had inconsistent approaches for the evaluation of the “adequate documentation”. This applies also to the case when one territory has more than one designated language.</p> <p>Furthermore, the procedure should foresee an appeal step in case the selected string is not accepted because of not being “meaningful”.</p>	<p>The criteria need to be reviewed in depth in PDP.</p> <p>Rationale: Proposed criteria have been adopted by the ccNSO Members in 2013. They are very similar to the criteria used in the Fast Track Process.</p>		

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5 3.5 Documentation of the meaningfulness of the selected IDN ccTLD string

6 The selected IDN ccTLD string(s) must be a **Meaningful Representation** of the name of the corresponding  
 7 **Territory**. A string is deemed to be meaningful if it is in the **Designated Language** of the **Territory** and if it is:

- 8 1 The name of the **Territory**; or  
 9 2 A part of the name of the **Territory** denoting the **Territory**; or

1           3       A short-form designation for the name of the **Territory** that is recognizable and denotes the **Territory** in  
2                   the selected language.  
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4       The meaningfulness requirement is verified as follows:  
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6       1.       If the selected string is listed in the UNGEGN Manual, then the string fulfills the meaningfulness  
7       requirement.  
8

9       2.       If the selected string is not listed in the UNGEGN Manual, the requester must then substantiate the  
10       meaningfulness by providing documentation from an internationally recognized expert or organization.  
11

12       ICANN should recognize and accept documentation from one of the following experts or organizations as  
13       internationally recognized:  
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- 15           a.       National Naming Authority – a government recognized National Geographic Naming Authority, or  
16                   other organization performing the same function, for the country or territory for which the selected  
17                   string request is presented. The United Nations Group of Experts on Geographical Names (UNGEGN)  
18                   maintains such a list of organizations at: <http://unstats.un.org/unsd/geoinfo/UNGEGN/nna.html>  
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- 20           b.       National Linguistic Authority – a government recognized National Linguistic Authority, or other  
21                   organization performing the same function, for the **Territory** for which the selected string request is  
22                   presented.  
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- 24           c.       ICANN agreed expert or organization – in the case where a **Territory** does not have access to one of  
25                   the Authorities listed before, it may request assistance from ICANN to identify and refer a recognized  
26                   expert or organization. Any expertise referred to or agreed upon by ICANN will be considered



1 acceptable and sufficient to determine whether a string is a **Meaningful Representation of a Territory**  
2 name.

3  
4 **WG Comments**

5 Are all authorities required to provide documentation? Originally they are intended as alternatives.

6 What is the logic behind a, b, c? Should be allowed that a cctld operator appoints an expert in the region or territory. Depend on the opinion of  
7 the expert to provide answers. For example the ccTLD Operator could appoint a linguistic expert. That case is missing.

8 Additional comment on point c: there is a qualifier that implies that c can only happen if a and b fail. A ccTLD operator may want to appoint an  
9 expert in addition to a naming authority. There are cases where an internationally recognized expert is brought in, in addition. Skill sets are  
10 equally relevant.

11 The language proposed I sresult form discussions from 2007 to 2009. Not ethe requirement is limited to the IDNccTLD string itself. It was also  
12 agreed that the request process should NOT be limited to existing ccTLD managers. In addition the process should involve the SIP of aTerritory  
13 (see section 4.2 below). For that reason, the lsit of experts was limited. Second reason: This is about the name of the territory. In principle,  
14 support of relevant government needed for what is considered a designated language for the name of a  
15 Territory. Same kind of mechanism. What is and what is not a **Designated Language** is first of all a matter of the relevant government, and not  
16 by a ccTLD appointed expert.

17 Qualifier for the icann agreed expert. Only can be appointed if a and b fail. Seems to preclude the ability to do a or b AND c.

18 This was to ensure that in principle the decision was made in **Territory**, and with the support of a government.

19 It should be a and b. Not only c. then you have a capture issue as well.

20 Option c only applies if a and b fails. Avoid situation that in case a or b lack for a Territory, the Territory is not eligible for an IDN ccTLD

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22 **3.6 Notes and Comments**

23 ICANN should include an example of the documentation that demonstrates the selected IDN ccTLD string(s) is a  
24 **Meaningful Representation** of the corresponding **Territory** in the implementation plan.

25  
26 ICANN should include a procedure, including a timeframe, to identify expertise referred to or agreed as set out  
27 above under c. in the implementation plan.

1 WG Comments 3.5 amd 3.6

2 Explicit reference to ICANN. Should be IFO?

3 Response: Policies developed by the ccNSO are directed at ICANN. Secondly, this policy is about the selection of an IDNccTLD string, which is  
4 outside the remit of the IANA Naming Function Operator ( IFO, PTI or IANA). The review and processing of the selected strings are conducted  
5 by an ICANN function, not by PTI (IFO or IANA). IANA processes become relevant after the string selction process has been completed and the  
6 IDNccTLD will be delegated, tranfered, revoked or retired, according to the existing policies, or as under development under ccPDP3)

7

### 8 3.7 Documentation **Designated Language**

9 The requirements for allowable languages and scripts to be used for the selected IDN ccTLD string is that the  
10 language must be a **Designated Language** in the **Territory** as defined in section (see above`). The language  
11 requirement is considered verified if one of the following conditions is met:

12 i. If the language is listed for the relevant **Territory** as an ISO 639 language in Part Three of the *Technical*  
13 *Reference Manual for the standardization of Geographical Names, United Nations*  
14 *Group of Experts on Geographical Names* (“UNGEGN Manual”)  
15 (<http://unstats.un.org/unsd/geoinfo/default.htm>);

16 or

17 ii. If the language is listed as an administrative language for the relevant **Territory** in the ISO 3166-1;

18 or

19 iii. If the relevant public authority of the **Territory** confirms that the language is used or serves as follows,  
20 (either by letter or link to the relevant government constitution or other online documentation from an  
21 official government website):

22 - Used in official communications by the relevant public authority; or

23 - Serves as a language of administration.

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1 **3.8 Notes and Comments**

2 ICANN should include an example of the documentation that the selected language(s) is considered designated  
3 in the Territory should in the implementation plan.

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5 **WG Discussion whether to include Designated Script**

6 **Question: should “IDNccTLD String must be in Designated Script” be introduced as additional criteria?**

7  
8 Observations:

9 IDNccTLDs strings are in scripts/ writing system and character. In principle without meaning, hence script should be focus area and  
10 designate which one could be used.

11 Some languages are written in two or more scripts, examples are listed in for instance the Ethnologue, which is maintained by SIL  
12 (also organization that maintained ISO639-3 (<https://www.ethnologue.com/language/ywa>)). To process designate the script or  
13 should all scripts be allowed?

14  
15 Language determine the related writing system/script and the number is limited. Vice versa, some scripts are used as writing  
16 system for 200 or more languages. In Fast Track and proposed text this relation is implied, by requiring a reference to the  
17 language, ( NOTE staff: this could be made more explicit to clarify what is intended, for example,

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19 It was also suggested that the current practice, to be liberal, and accept selected strings based on languages. Languages are the  
20 means of communication and inclusive on a Territory basis. However set clear and strict criteria with respect to the requirements  
21 of the strings.

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23 **4.Required SUPPORT for proposed string**

24 **4.1 The selected IDN ccTLD string should be non-contentious within the Territory.** The selected IDN  
25 ccTLD string must be non-contentious within the **Territory**. This is evidenced by support/endorsement from the  
26 **Significantly Interested Parties** (relevant stakeholders) in the territory.  
27

1 Concurrent requests for two strings in the same language and for the same **Territory** will be considered  
 2 competing requests and therefore to be contentious in territory. This needs to be resolved in **Territory**, before any  
 3 further steps are taken in the selection process.  
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Section in Original Document	Topic	Comment/Rationale for review/inclusion in list	Proposed next step	Adjust wording	Proposed Wording/ Comment WG
2.1.2 G	<p><b>The selected IDN ccTLD string should be non-contentious within the territory.</b> The selected IDN ccTLD string must be non-contentious within the territory. This is evidenced by support/endorsement from the Significantly Interested Parties (relevant stakeholders) in the territory. Concurrent requests for two strings in the same language and for the same territory will be considered competing requests and therefore to be contentious in territory. This needs to be resolved in territory,</p>	<p>ICANN must make sure there is consistency between the delegation of an ASCII ccTLD and an IDN ccTLD. Therefore, contentious requests should be resolved in the territory.</p>	<p>Ensure application of basic principle that IDN ccTLD and ASCII ccTLD should be treated similar</p>		

	before any further steps are taken in the selection process.				
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4.2 Documentation of required endorsement / support for selected string by Significantly Interested Parties

4.2.1 Definition of Significantly Interested Parties. Significantly Interested Parties include but are not limited to:

- a) the government or territorial authority for the country or territory associated with the IDN ccTLD string and
- b) any other individuals, organizations, companies, associations, educational institutions or others that have a direct, material, substantial, legitimate and demonstrable interest.

To be considered a **Significantly Interested Party**, any party other than the government or territorial authority for the country or territory associated with the selected IDN ccTLD must demonstrate that it is has a direct, material, legitimate and demonstrable interest in the operation of the proposed IDN ccTLD(s).

Requesters should be encouraged to provide documentation of the support of stakeholders for the selected string, including an opportunity for stakeholders to comment on the selection of the proposed string via a public process. “Stakeholders” is used here to encompass **Significantly Interested Parties**, “interested parties” and “other parties.”

4.2.2 Classification of input

For procedural purposes the following cases should be distinguished:

- Request for the full or short name of Territory (as defined in Section 3 E).
- Other cases, where additional documentation is required.

1 In both cases the relevant Government / Public Authority needs to be involved and at a minimum its non-  
2 objection should be documented.

#### 3 4 *4.3 Notes and Comments*

5 In case where additional documentation is required:

- 6 - Unanimity should NOT be required.
- 7 - The process should allow minorities to express a concern i.e. should not be used against legitimate  
8 concerns of minorities
- 9 - The process should not allow a small group to unduly delay the selection process.

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11 ICANN should include an example of the documentation required to demonstrate the support or nonobjection  
12 for the selected string(s) in the implementation plan.

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Section in original Document	Topic	Comment/Rationale for review/ inclusion in list	Proposed next step	Adjust wording?	Comments WG/Updated wording
2.1.3 - 2	Documentation of required endorsement / support for selected string by Significantly Interested Parties	In the Fast Track Process and underlying methodology the reference is to Local Internet Community, which was in use up- and until the Framework of Interpretation was adopted and implemented. Going forward the terminology should be used consistently across different ccTLD related policies.	Review and update the current proposed policy to ensure consistent documentation and terminology.		

Section in original Document	Topic	Comment/Rationale for review/ inclusion in list	Proposed next step	Adjust wording?	Comments WG/Updated wording
		Ensure required documentation and terminology is used consistently across the ccTLD related policy documentation ( RFC 1591 & related Framework of Interpretation, ccPDP 3 and overall policy for selection of IDN ccTLD strings.			
2.1.3 - 2	<p>Classification of input. For procedural purposes the following cases should be distinguished [...].</p> <p>Notes and Comments</p> <p>In case where additional documentation is required:</p> <p>Unanimity should NOT be required.</p> <p>The process should allow minorities to express a concern i.e. should not be used</p>	To be consistent with previously stated procedures, any issue must be sorted within the territory.	Review the clarifications provided in the text of ccPDP 2. Ensure consistency and clear basis for interpretation.		

Section in original Document	Topic	Comment/Rationale for review/ inclusion in list	Proposed next step	Adjust wording?	Comments WG/Updated wording
	<p>against legitimate concerns of minorities</p> <p>The process should not allow a small group to unduly delay the selection process.</p>				
2.1.3	<p>Stage 1  <u>Documentation</u>  <u>Designated Language</u></p>	<p>Should the documentation submitted to ICANN be written in English or could be written with the requested IDN string?</p>	<p>The criteria need to be reviewed in depth in PDP. Rationale: Proposed criteria have been adopted by the ccNSO Members in 2013.</p>		



Section in original Document	Topic	Comment/Rationale for review/ inclusion in list	Proposed next step	Adjust wording?	Comments WG/Updated wording
2.1.3	Stage 2 in the “ <u>3. Validation of selected string</u> ”	Should the selected string (U-label) not show any confusion with previous approved (U-labels)?  The confusing similarity review procedures should be reviewed and updated	See above with respect to section 2.1.2 I of proposed policy.		

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**Variants PLACEHOLDER**

Note that the criteria and process and procedures of this section shall be reviewed and updated by one of the sub-groups

To date (March 2013) identifying the issues pertaining to the management of variant TLD’s are still under discussion by the community, in particular the delineation of technical, policy and operational aspects. For this reason, policy recommendations pertaining to the management of variant IDN ccTLDs, if any, are not included, but will be added at a later stage.

Section in document	Topic	Comment/Rationale for review/ inclusion in list	Proposed next step
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NA	Variant management	The element of “variant management” has become quite relevant in the overall IDN environment. Therefore, it is recommendable that any IDN string selection process takes it into account.	<p>It needs to be included in proposed policy. It is suggested to launch a ccNSO PDP. The 2013 IDN ccTLD proposals includes a placeholder with the understanding at the time that further work needed to be done.</p> <p>Further, at the request of the ICANN Board of Directors the ccNSO will need to coordinate with the GNSO work in this area.</p> <p>Mechanism to coordinate is through a coordination committee/working party. This model is light weight, without the baggage of a Cross-community working group. The results will feed into each of the PDPs</p> <p>Membership is from the ccNSO PDP and GNSO PDP WG membership with membership open to interested groups.</p> <p>Before becoming part of the ccNSO PDP WG proposals the results need to be accepted by the membership of the ccNSO PDP WG</p> <p>Once included in the total package it shall be treated in same manner as other proposals.</p>
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**5 GENERAL STRING REQUIREMENTS AND THEIR VALIDATION ( From section 2.1.1)**

1 **5.1 Technical Criteria**

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3 **The selected IDN ccTLD string must abide by all Technical Criteria for an IDN TLD string.** In addition to the  
4 general requirements for all labels (strings), the selected IDN ccTLD string must abide to the normative parts of RFC  
5 5890, RFC 5891, RFC 5892 and RFC 5893.

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7 All applicable technical criteria (general and IDN specific) for IDN ccTLD strings should be documented as part  
8 of the implementation plan. For reasons of transparency and accountability they should be made public prior to  
9 implementation of the overall policy and endorsed by the ccNSO.

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11 Validation that a string meets the technical criteria is a process step and shall be conducted by an external,  
12 independent panel. The recommended procedure is described in Section 2.1.3, Processes and Documentation.

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14 The method and criteria for the technical validation should be developed as part of the implementation plan and  
15 are a critical part of the review process. For reasons of transparency and accountability they should be made  
16 public prior to implementation of the overall policy and endorsed by the ccNSO.

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Section in Original Document	Topic	Comment/Rationale for review/inclusion in list	Proposed next step	Adjust wording	Proposed Wording/ Comment WG
2.1.2 H	In addition to the general requirements for all labels (strings), the selected IDN ccTLD string must abide to the normative parts of RFC 5890, RFC 5891, RFC 5892 and RFC 5893.	It need to be ensured that technical criteria are still valid. It will also need to be reviewed whether the proposed mechanism	The criteria need to be reviewed in depth in PDP and reconfirmed if deemed appropriate.		

	All applicable technical criteria (general and IDN specific) for IDN ccTLD strings should be documented as part of the implementation plan. For reasons of transparency and accountability they should be made public prior to implementation of the overall policy and endorsed by the ccNSO.	with respect to including the technical criteria as part of the implementation is appropriate.	Rationale: Proposed criteria have been adopted by the ccNSO Members in 2013.		
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1  
2 **5.2 Confusing Similarity (From section 2.1.2) (to be reviewed by 3<sup>rd</sup> Sub-Group)**

3 Note that the criteria and process and procedures of this section shall be reviewed and updated by one of the  
4 sub-groups

5  
6 **Confusing similarity of IDN ccTLD Strings.** A selected IDN ccTLD string should not be confusingly similar with:

- 7
- Any combination of two ISO 646 Basic Version (ISO 646-BV) characters<sup>5</sup> (letter [a-z] codes), nor
  - Existing TLDs or Reserved Names as referenced in the new gTLD Applicant Guidebook<sup>6</sup>
- 8  
9

10 The following supplemental rules provide the thresholds to solve any contention issues between the IDN ccTLD  
11 selection process and new gTLD process:

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<sup>5</sup> International Organization for Standardization, "Information Technology – ISO 7-bit coded character set for information interchange," ISO Standard 646, 1991

<sup>6</sup> Version 2012-06-04, section 2.2.1.2.1 Reserved Names.

- 1 • A gTLD application that is approved by the ICANN Board will be considered an existing TLD unless it is  
2 withdrawn.
- 3 • A validated request for an IDN ccTLD will be considered an existing TLD unless it is withdrawn.

4 A selected IDN ccTLD string is considered confusingly similar with one or more other string(s) (which must be  
5 either Valid-U-labels or any a combination of two or more ISO 646 BV characters) if the appearance of the  
6 selected string in common fonts in small sizes at typical screen resolutions is sufficiently close to one or more  
7 other strings so that it is probable that a reasonable Internet user who is unfamiliar with the script would  
8 perceive the strings to be the same or confuse one for the other<sup>7</sup>.

9  
10 The review of whether or not a selected IDN ccTLD string is confusingly similar is a process step and should be  
11 conducted externally and independently. The recommended procedure is described in Section 2.1.3, Processes  
12 and Documentation.

13  
14 The method and criteria to assess confusing similarity should be developed as part of the implementation  
15 planning. For reasons of transparency and accountability they should be made public prior to implementation of  
16 the overall policy and endorsed by the ccNSO.

17  
18 The assessment of confusing similarity of strings depends on amongst other things linguistic, technical, and  
19 visual perception factors, therefore these elements should be taken into consideration in developing the  
20 method and criteria.

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<sup>7</sup> Based on Unicode Technical Report #36, Section 2: Visual Security Issues

1 Taking into account the overarching principle to preserve and ensure the security, stability and interoperability  
2 of the DNS, the method and criteria for the confusing similarity assessment of an IDN ccTLD string should take  
3 into account and be guided by the Principles for Unicode Point Inclusion in labels in the DNS Root<sup>8</sup>.  
4

#### 5 *Notes and Comments*

6 The rule on confusing similarity originates from the IDN WG and Fast Track Implementation Plan and was  
7 introduced to minimize the risk of confusion with existing or future two letter country codes in ISO 3166-1 and  
8 other TLDs. This is particularly relevant as the ISO 3166 country codes are used for a broad range of applications,  
9 for example but not limited to, marking of freight containers, postal use and as a basis for standard currency  
10 codes.

11 The risk of string confusion is not a technical DNS issue, but can have an adverse impact on the security and  
12 stability of the domain name system, and as such should be minimized and mitigated.

13 The method and criteria used for the assessment cannot be determined only on the basis of a linguistic and/or  
14 technical method of the string and its component parts, but also needs to take into account and reflect the  
15 results of scientific research relating to confusing similarity, for example from cognitive neuropsychology<sup>9</sup>.  
16

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<sup>8</sup><https://datatracker.ietf.org/doc/draft-iab-dns-zone-codepoint-pples/>

<sup>9</sup> See for example, M. Finkbeiner and M. Coltheart (eds), Letter Recognition: from Perception to Representation. Special Issue of the Journal *Cognitive Neuropsychology*, 2009

Section In Document	Topic	Comment/Rational for review/inclusion in list	Proposed next step
2.1.2 I	Confusing similarity of IDN ccTLD Strings.	<p>As there is only one DNS environment and as domain name end-users/registrants are the same customers all over the internet eco-system – and has such have the same rights, the element of possible confusing similarity between an applied-for TLD must be treated by ICANN the same way, independently from being a cc, g or an IDN TLD.</p> <p>This will ensure that the current discriminatory rules for the evaluation of IDN ccTLDs are modified consequently, become in line with the provisions that are currently in place environments. Those considerations apply also to the steps detailed under 2.1.3 “Procedures and Documentation”. and in other TLD</p>	<p>The confusing similarity review procedures need to be reviewed in depth. It needs to be done under a ccNSO PDP and if feasible the ccNSO will need to coordinate with the GNSO work in this area.</p> <p>Mechanism to coordinate is through a coordination committee/working party. This model is light weight, without the burden of a Crosscommunity working group. The results will feed into each of the PDPs.</p> <p>Membership is from the ccNSO PDP and GNSO PDP WG membership with membership open to interested groups.</p> <p>Before becoming part of the ccNSO PDP WG proposals the results need to be accepted by the membership of the ccNSO PDP WG</p> <p>Once included in the total package it shall be treated in same manner as other proposals (subject to Council and Membership adoption).</p> <p>Rationale: Confusing similarity review is currently part of both of IDN ccTLD and new gTLD processes and policy proposals. Over time the methods, criteria and procedures have evolved differently.</p>

Section In Document	Topic	Comment/Rational for review/inclusion in list	Proposed next step
			The ccNSO Proposals are part of the original recommended policy and need to be updated through a ccNSO PDP.

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**6. TECHNICAL Validation and CONFUSING SIMILARITY Processes and Procedures (From section 2.1.3)**

Staff Note: The original text was structured in such a way that combining the text in criteria section and Processes and Procedures, is difficult to combine in a consistent manner.

*b. Independent Reviews*

**6.1 General description of Technical and string confusion review**

It is recommended that ICANN appoint the following external and independent Panels:

- To validate the technical requirements ICANN should appoint a “Technical Panel<sup>10</sup>” to conduct a technical review of the selected IDN ccTLD string.

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<sup>10</sup> Or any other name ICANN would prefer.



- 1           • To validate a selected string is not confusingly similar, ICANN should appoint an external and independent  
2           “ Similarity Review Panel” to review the selected IDN ccTLD string for confusing similarity.
- 3           • To allow for a final validation review relating the confusing similarity, and only if so requested by the  
4           requester, ICANN should appoint, an external and independent “ Extended Process Similarity Review  
5           Panel.”

6           As part of the implementation planning the details of the roles and responsibilities of the panels and its  
7           membership requirements should be developed in conjunction with the development of the methods and  
8           criteria for assessing the technical<sup>11</sup> and confusing similarity<sup>12</sup> validity of the selected IDN ccTLD strings and  
9           details of the reporting as foreseen for the validation processes.

## 10 11           **6.2 Process for Technical Validation**

- 12           1.       After completion of the ICANN staff validation of the request, ICANN staff will submit the selected IDN  
13           ccTLD string to the “Technical Panel” for the technical review.
- 14           2.       The Technical Panel conducts a technical string evaluation of the string submitted for evaluation. If  
15           needed, the Panel may ask questions for clarifications through ICANN staff.
- 16           3.       The findings of the evaluation will be reported to ICANN staff. In its report the Panel shall include the  
17           names of the Panelists and document its findings, and the rationale for the decision.

18  
19           Usually the Panel will conduct its review and send its report to ICANN staff within 30 days after receiving the  
20           IDN ccTLD string to be evaluated. In the event the Panel expects it will need more time, ICANN staff will be  
21           informed. ICANN staff shall inform the requester accordingly.

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22  
<sup>11</sup>See section 2.1.2 H above

<sup>12</sup>See 2.1.2 I above

1 4 If according to the technical review the string meets all the technical criteria the string is technically validated.  
2 If the selected string does not meet all the technical criteria the string is not-valid. ICANN staff shall inform and  
3 notify the requester accordingly.  
4

#### 5 **6.4 Process for confusing similarity validation (to be reviewed by 3<sup>rd</sup> sub-group)**

6 1. After completion of the Technical Validation ICANN staff will submit the selected IDN ccTLD string to the  
7 String Similarity Panel for the confusing similarity string evaluation.  
8

9 2. The Panel shall conduct a confusability string evaluation of the string submitted for evaluation. The Panel  
10 may ask questions for clarification through ICANN staff.  
11

12 3. The findings of the evaluation will be reported to ICANN staff. In the report the Panel will include the  
13 names of the Panelists, document the decision and provide the rationale for the decision. Where the string is  
14 considered to be confusingly similar the report shall at a minimum include a reference to the string(s) to which  
15 the confusing similarity relates and examples (in fonts) where the panel observed the similarity.

16 ICANN staff shall inform and notify the requester accordingly.

17 Usually the Panel will conduct its review and send its report to ICANN staff within 30 days after receiving the  
18 IDN ccTLD string to be evaluated. In the event the Panel expects it will need more time, ICANN staff will be  
19 informed. ICANN staff shall inform the requester accordingly.  
20

21 4.a. If according to the review, the Panel does not consider the string to be confusingly similar, the selected IDN ccTLD  
22 is validated.  
23

24 4 b. If according to the review the selected IDN ccTLD string presents a risk of string confusion with one  
25 particular combination of two ISO 646 Basic Version (ISO 646-BV) characters and this combination is according

1 the ISO 3166 standard the two-letter alpha-2 code associated with same Territory as represented by the  
2 selected string, this should be noted in the report. ICANN staff shall inform the requester accordingly.  
3

4 If, within 3 months of receiving the report the requestor shall confirm that:

- 5 (i) The intended manager and intended registry operator for the IDN ccTLD and the ccTLD manager for  
6 the confusingly similar country code are one and the same entity; and (ii) The intended manager of the  
7 IDN ccTLD shall be the entity that requests the delegation of the IDN ccTLD string; and
- 8 (iii) The requester, intended manager and registry operator and, if necessary, the relevant public  
9 authority, accept and document that the IDN ccTLD and the ccTLD with which it is confusingly similar  
10 will be and will remain operated by one and the same manager, and
- 11 (iv) The requester, intended manager and registry operator and, if necessary, the relevant public  
12 authority agree to specific and pre-arranged other conditions with the goal to mitigate the risk of user  
13 confusion as of the moment the IDN ccTLD becomes operational;

14 then the IDN ccTLD string is deemed to be valid.

15 If either the requester, intended manager or the relevant public authority do not accept the prearranged  
16 conditions within 3 months after notification or at a later stage refutes the acceptance, the IDN ccTLD shall not  
17 be validated.

18 Alternatively, the requester may defer from this mechanism and use the procedure as described under 4 c.  
19

20 4c.

21 i.If according to the review the selected IDN ccTLD string is found to present a risk of string confusion, ICANN staff  
22 shall inform the requester in accordance with paragraph 3 above. The requester may call for an Extended Process  
23 Similarity Review and provide additional documentation and clarification referring to aspects in the report of the  
24 Panel. The requester should notify ICANN within three (3) calendar months after the date of notification by ICANN,  
25 and include the additional documentation. After receiving the notification from the requester, ICANN staff shall call  
26 on the Extended Process Similarity Review Panel (EPSRP).

1  
2 ii. The EPSRP conducts its evaluation of the string, based on the standard and methodology and criteria developed for  
3 it, and, taking into account, but not limited to, all the related documentation from the requester, including submitted  
4 additional documentation, IDN tables available, and the finding of the Similarity Review Panel. The EPSRP may ask  
5 questions for clarification through ICANN staff.

6  
7 iii. The findings of the EPSRP shall be reported to ICANN staff and will be publicly announced on the ICANN  
8 website. This report shall include and document the findings of the EPSRP, including the rationale for the final  
9 decision, and in case of the risk of confusion a reference to the strings that are considered confusingly similar  
10 and examples where the panel observed this similarity.

11 If according to the Extended Process Similarity Review, the EPSRP does not consider the string to be confusingly  
12 similar the selected IDN ccTLD is valid.  
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## 17 **From Section 2.1.3 , 2013 Report to the Board**

### 18 **7 Stage 1: String Selection stage in Territory**

#### 19 ***7.1 1. General Description***

20 The string selection stage is a local matter in Territory and should ideally involve all relevant local actors in  
21 Territory. The actors in Territory must:

- 22 1. Identify the script and language for the IDN Table and prepare this Table if necessary,
- 23 2. Select the IDN ccTLD string. The selected string must meet the meaningfulness and technical  
24 requirements and should not be confusingly similar.
- 25 3. Document endorsement /support of the relevant stakeholders in Territory for the selected string, and

- 1           4. Select the intended IDN ccTLD string requester before submitting an IDN ccTLD string for validation. In  
2           cases where the string requester is not yet selected, the relevant public authority of the Territory may act as  
3           nominee for the to be selected string requester.  
4

#### 5           *Notes and Comments*

6           As stated, the string selection stage is a local matter in Territory and should ideally involve all relevant local  
7           actors in Territory. Typically, this would include:

- 8           • The IDN ccTLD string requester. This actor initiates the next step of the process, provides the necessary  
9           information and documentation, and acts as the interface with ICANN. Typically this actor is the expected  
10           IDN ccTLD manager.
- 11          • The relevant public authority of the Territory associated with the selected IDN ccTLD.
- 12          • Parties to be served by the IDN ccTLD. They are asked to show that they support the request and that it  
13           would meet the interests and needs of the local Internet community.  
14

15          Additionally, these actors may wish to involve recognised experts or expert groups to assist them to select the  
16          IDN ccTLD string, prepare the relevant IDN Table or assist in providing adequate documentation.  
17

18          Further, and at the request of the actors in Territory ICANN may provide assistance to them to assist with the in-  
19          Territory Process.  
20

## 21          **8. 2. Detailed aspects String Selection Stage**

### 22          8.1 IDN Table

23          As part of the preparation in territory an IDN Table, or any later variant for the name designating such a table,  
24          must be defined. The IDN Table needs to be in accordance with the requirements of the policy and procedures

1 for the IANA IDN Practices Repository<sup>13</sup>. The IDN Table may already exist i.e. has been prepared for another IDN  
2 ccTLD or gTLD using the same script and already included in the IANA IDN Practices Repository. In this case the  
3 existing and recorded IDN Table may be used by reference. If the same script is used in two or more territories,  
4 cooperation is encouraged to define an IDN Table for that script. ICANN is advised either to facilitate these  
5 processes directly or through soliciting relevant international organisation to facilitate.  
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<b>Section in original Document</b>	<b>Topic</b>	<b>Comment/Rationale for review/ inclusion in list</b>	<b>Proposed next step</b>	<b>Adjust wording?</b>	<b>Comments WG/Updated wording</b>
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<sup>13</sup> <http://www.iana.org/procedures/idn-repository.html>

2.1.3 - 2	<p><b>IDN Table</b> The IDN Table may already exist i.e. has been prepared for another IDN ccTLD or gTLD using the same script and already included in the IANA IDN Practices Repository. In this case the existing and recorded IDN Table may be used by reference.</p>	<p>Using the IDN Table prepared for another IDN cc or gTLD could be an option under specific conditions.</p> <p>When recommendation was developed Variant Management was not taken into consideration. Going forward it is clearly a topic that will need to be addressed and should be taken into consideration</p>	<p>Variant Management and RZLabel Generation rules and related work on IDN Tables should be reviewed and included in the update of the ccNSO Policy. Work to be undertaken as (part of) ccNSO PDP. Rationale: In current proposal</p>		
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**9. Stage 2: Validation of IDN ccTLD string (From Section 2.1.3 , 2013 Report to the Board )**

**9.1 1. General description**

The String Validation stage is a set of procedures to ensure all criteria and requirements regarding the selected IDN ccTLD string (as listed in Section 3 of the Report) have been met. Typically this would involve:

- The IDN ccTLD string requester. This actor initiates the next step of this stage of the process by submitting a request for adoption and associated documentation.
- ICANN staff. ICANN staff will process the submission and coordinate between the different actors involved.

- Independent Panels to review the string (Technical and Similarity Panels).

The activities during this stage would typically involve:

1. Submission of IDN table.
2. Submission of selected string and related documentation.
3. Validation of selected IDN ccTLD string:
  - a. ICANN staff validation of request. This includes
    - i. Completeness of request
    - ii. Completeness and adequacy of Meaningfulness and Designated Language documentation
    - iii. Completeness and adequacy of support from relevant public authority
    - iv. Completeness and adequacy of support from other Significantly Interested Parties
  - b. Independent Reviews.
    - i. Technical review
    - ii. String Confusion review
4. Publication of selected IDN ccTLD string on ICANN website
5. Completion of string Selection Process
6. Change, withdrawal or termination of the request.

## ***9.2 2. Detailed aspects String Validation Stage***

### ***1. Submission of IDN Table***



1 As part of the validation stage an IDN Table needs to be lodged with the IANA IDN Repository of IDN Practices,  
2 in accordance with the policy and procedures for the IANA IDN Practices Repository<sup>14</sup>.

### 3 4 5 9.3

6 2. Submission procedure for selected string and related documentation This part of the process is considered a  
7 matter of implementation.

### 8 9 9.4

#### 10 3. Validation of selected string

##### 11 *a. ICANN staff validation of the request*

12 After the requester has submitted a request for an IDN ccTLD string, ICANN should at least validate that:

- 13 • The selected IDN ccTLD refers to a territory listed on ISO 3166-1 list
- 14 • The selected string (A-label) does not exist in the DNS, nor is approved for delegation to another party,
- 15 • The selected string (U-label) contains at least one (1) non-ASCII character.
- 16 • The required A-label, U-label, and corresponding Unicode points to designate the selected IDN ccTLD
- 17 string are consistent.
- 18 • Documentation on meaningfulness is complete and meets the criteria and requirements.
- 19 • Documentation on the Designated Language is complete and meets the criteria and requirements.
- 20 • Documentation to evidence support for the selected string is complete and meets the criteria and
- 21 requirements and is from an authoritative source.
- 22

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<sup>14</sup> <http://www.iana.org/procedures/idn-repository.html>

1 If one or more elements listed are not complete or deficient, ICANN shall inform the requester accordingly. The  
 2 requester should be allowed to provide additional information, correct the request, or withdraw the request  
 3 (and potentially resubmit at a later time). If the requester does not take any action within 3 months after the  
 4 notification by ICANN that the request is incomplete or contains errors, the request may be terminated by  
 5 ICANN for administrative reasons.

6

Section in original document	Topic	Comment/Rationale for review/ inclusion in list	Proposed next step	Adjust wording?	Comments WG / Updated wording
2.1.3	Stage 1 <u>Documentation Designated Language</u>	Should the documentation submitted to ICANN be written in English or could be written with the requested IDN string?	The criteria need to be reviewed in depth in PDP. Rationale: Proposed criteria have been adopted by the ccNSO Members in 2013.		
2.1.3	Stage 2 in the “ <u>3. Validation of selected string</u> ”	Should the selected string (U-label) not show any confusion with previous approved (U-labels)?  The confusing similarity review procedures should be reviewed and updated	See above with respect to section 2.1.2 I of proposed policy.		

8 If all elements listed are validated, ICANN shall notify the requester accordingly and the Technical Validation  
 9 Procedure will be initiated.

10

1 If ICANN staff anticipates issues pertaining to the Technical and String Confusion Review during its initial review  
2 of the application, ICANN staff is advised to inform the requester of its concerns. The requester will have the  
3 opportunity to either:

- 4 1. Change the selected string, or
- 5 2. Tentatively request two or more strings as part of the application including a ranking of the preference to  
6 accommodate the case where the preferred string is not validated.
- 7 3. Withdraw the request, or
- 8 4. Continue with the request as originally submitted.

9  
10 Details of the verification procedures and additional elements, such as the channel of communication, will need  
11 to be further determined. This is considered a matter of Implementation planning.

## 12 9.4

### 13 *b. Independent Reviews*

#### 14 **General description of Technical and string confusion review**

15 Staff Comment: Note the topics in this section from Section 2.1.3 , 2013 Report to the Board will be reviewed and  
16 updated by sub-group.

## 17 **10 Publication of IDN ccTLD string**

18 After successful completion of the request validation procedure and the IDN ccTLD string is valid according to both  
19 technical and string similarity review procedures, ICANN shall publish the selected IDN ccTLD String publicly on its  
20 website.

1 **11. Completion of IDN ccTLD selection process**

2 Once the selected IDN ccTLD string is published on the ICANN website, and the IDN ccTLD selection process is  
3 completed, delegation of the IDN ccTLD string may be requested in accordance with the current policy and practices  
4 for the delegation, re-delegation and retirement of ccTLDs. ICANN shall notify the requester accordingly.

5  
6 **12. Change, withdrawal or termination of the request**

7 ICANN staff shall notify the requester of any errors that have occurred in the application. These errors include, but are  
8 not limited to:

- 9
- 10 • The selected string is already a string delegated in the DNS, or approved for delegation to another party.
  - 11 • Issues pertaining to the required documentation.
  - 12 • The country or territory of the request does not correspond to a listing in the ISO3166-1 list or the European  
13 Union.
  - 13 • If in accordance with the independent review procedure the selected string is not valid.

14 If such errors emerge, ICANN staff should contact the requester, who should be provided the opportunity to:

- 15
- 15 • Amend, adjust or complete the request under the same application in order to abide to the criteria, or
  - 16 • Withdraw the request.

17  
18 If the requester has not responded within 3 calendar months of receiving the notice by ICANN staff, the request  
19 will be terminated administratively.

20 Details of the procedures and additional elements, such as the channel of communication, will need to be  
21 further documented. This is considered a matter of Implementation planning.

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23

1 **13 Miscellaneous part of proposals**

2 **From Section 2.1.4 , 2013 Report to the Board**

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6 **13.1 A. Delegation of an IDN ccTLD must be in accordance with current policies, procedures and practices for**  
7 **delegation of ccTLDs**

8 Once the IDN ccTLD string has been selected and the String Validation Stage has been successfully concluded,  
9 the delegation of an IDN ccTLD shall be according to the policy and practices for delegation of ccTLDs. This  
10 means that the practices for re-delegation and retirement of ccTLDs apply to IDN ccTLDs.  
11

12 **13.2 B. Confidentiality of information during due diligence stage, unless otherwise foreseen.**

13 It is recommended that the information and support documentation for the selection of an IDN ccTLD string is  
14 kept confidential by ICANN until it has been established that the selected string meets all criteria.  
15

16 **13.4 C. Creation of list over time**

17 Experience has shown that entries on the ISO 3166-1 table change over time. Such a change can directly impact  
18 the eligibility for an IDN ccTLD. In order to record these changes, it is recommended that a table will be created  
19 over time of validated IDN ccTLDs, its variants and the name of the territory in the Designated Language(s), both  
20 in the official and short form, in combination with the two-letter code and other relevant entries on the ISO 3166-  
21 1 list. The purpose of creating and maintaining such a table is to maintain an authoritative record of all relevant  
22 characteristics relating to the selected string and act appropriately if one of the characteristics changes over time.  
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### 13.5 Notes and comments

As noted above the ISO 3166-1 is not only relevant for the creation of a ccTLD. Once an entry is removed from the list of country names, the ccTLD entry in the root zone database may need to be adjusted/removed to maintain parity between the ISO 3166 list and the root-zone file<sup>15</sup>.

Section in document	Topic	Comment/Rationale for review/ inclusion in list	Proposed next step	Adjust text?	Updated text/comments WG
2.1.4 C	Creation of list over time Experience has shown that entries on the ISO 3166-1 table change over time. Such a change can directly impact the eligibility for an IDN ccTLD. In order to record these changes, it is recommended that a table will be created over time of validated IDN ccTLDs, its variants and the name of the territory in the Designated	The update frequency caused issues in the past. It might be advisable to review it.  It is questionable whether this mechanism still makes sense in the current context. Who is responsible for creating the table and what is the frequency for updating it? What is purpose?	Review and update/amend this section of the proposed policy as part of a ccNSO PDP.  Rationale: This element of the policy needs to be reviewed but was included at the suggestion of some GAC members at the time and adopted by the ccNSO members in 2013. Needs to be ensured that both GAC (members) and ccNSO		

<sup>15</sup> See: <http://www.iana.org/reports/2007/rs-yu-report-11sep2007.html>

	<p>Language(s), both in the official and short form, in combination with the two--letter code and other relevant entries on the ISO 3166-1 list. The purpose of creating and maintaining such a table is to maintain an authoritative record of all relevant characteristics relating to the selected string and act appropriately if one of the characteristics changes over time.</p>				
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**13. 6D. Transitional arrangement regarding IDN ccTLD strings under the Fast Track IDN ccTLD Process**

1. Closure of Fast Track Process. Upon implementation of the policy for the selection of IDN ccTLDs by ICANN, the policy for selection of IDN ccTLDs only applies to new requests, unless a requester indicates otherwise.
2. If an IDN ccTLD string request submitted under the Fast Track Process is still in process or has been terminated due to non-validation of the string, the requester may within three months after implementation of the policy request a second, final validation review by the Extended Process Similarity Review Panel .

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**13. 7 E. Review of policy for the selection of IDN ccTLD strings**

It is recommended that the policy will be reviewed within five years after implementation or at such an earlier time warranted by extraordinary circumstances. It is also recommended that the ICANN Board of Directors should initiate such a review including consulting the ALAC, ccNSO and GAC on the Terms of Reference for the review.

In the event such a review results in a recommendation to amend the policy, the rules relating to the country code Policy Development Process as defined in the ICANN Bylaws should apply.

Section in document	Topic	Comment/Rationale for review/ inclusion in list	Proposed next step	Adjust text?	Updated text/comments WG
2.1.4 E	<b>Review of policy for the selection of IDN ccTLD strings</b> It is recommended that the policy will be reviewed within five years after implementation or at such an earlier time warranted by extraordinary circumstances [...].	It would be advisable to review the policy whenever deemed appropriate. Considering the dynamic internet landscape, should any significant scenario change and/or arise, it would be quite challenging to wait 5 years to review the policy.  Is review warranted every 5 years? What	Review and update/amend this section of the proposed policy as part of a ccNSO PDP.  Rationale: Adopted by the ccNSO Members in 2013.		



		<p>should be the scope of such a review? Should timing be better defined?.</p> <p>Is this a normal behavior in any ICANN policy or it is a new mechanism for IDN policy, if it is specific to IDNs, 5 years may be too long, especially in the beginning.</p>			
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**13. 8 F. Verification of Implementation**

It is anticipated that some parts of the recommendations and process steps will need to be further refined and interpreted by ICANN staff before they will be implemented. It is further anticipated that this will be done through an implementation plan or similar planning document. It is therefore recommended that the ccNSO monitors and evaluates the planned implementation of recommendations and the ccNSO Council reviews and approves the final planning document, before implementation by staff.

**13. 9 G. Permanent IDN ccTLD Advisory Panel**

Due to the complex nature of IDN’s and the sensitivities and interest involved in the selection of IDN ccTLD strings, it is recommended that under the overall policy a Permanent IDN ccTLD Advisory Panel is appointed to assist and provide guidance to ICANN staff and the Board on the interpretation of the overall policy in the event the overall policy does not provide sufficient guidance and/or the impact of the policy is considered to be unreasonable or unfair for a particular class of cases.

1 The IDN ccTLD Advisory Panel members should consist of one member from ALAC, two members from the  
 2 ccNSO, two members of the GAC, one member of SSAC. The ICANN Board should appoint the members of the  
 3 Panel nominated by the related Supporting Organisation and Advisory Committees

Section in document	Topic	Comment/Rationale for review/ inclusion in list	Proposed next step	Adjust text?	Updated text/comments WG
2.1.4 G	Permanent IDN ccTLD Advisory Panel Due to the complex nature of IDN's and the sensitivities and interest involved in the selection of IDN ccTLD strings, it is recommended that under the overall policy a Permanent IDN ccTLD Advisory Panel is appointed to assist and provide guidance to ICANN staff and the Board on the interpretation of the overall policy in the event the overall policy does not provide sufficient guidance and/or the impact of the policy is considered to be	<p>An advisory panel might have a role if it is made of true IDN experts within and outside the ICANN constituency community. Considering how challenging this could be, it would be recommendable to seek alternative channels to advise on possible issues and changes relating to the policy.</p> <p>Current practice around implementation includes public comments etc. In addition creating such a permanent advisory panel, could be prove not to be feasible in light of current</p>	<p>Review and update/amend this section of the proposed policy as part of a ccNSO PDP.</p> <p>Rationale: Proposed panel was adopted by the ccNSO Members in 2013.</p>		

	unreasonable or unfair for a particular class of cases. [...].	workload and priorities of the ccNSO and other communities			
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**TABLE 6: Other, additional topics**

Section in document	Topic	Comment/Rationale for review/ inclusion in list	Proposed next step	Adjust Text?	Updated text/comments WG
NA	Retirement of IDN ccTLD	The retirement of ASCII ccTLD is triggered by the removal of the country code form the ISO 3166-1 list. This may be caused by a significant change of name of the country or territory, which results in a need to change the two-letter code and removal of the former. Looking at the selection criteria, the question is which, if any, of the listed criteria, may/should cause the retirement of an IDN ccTLD, and cause the	The ccNSO PDP on IDN ccTLD should be amended to include what will cause the retirement of an IDN ccTLD.  Rationale: The retirement process will be defined through ccNSO PDP 3 will be applicable to both IDNccTLD and ASCII ccTLDs.  The event leading up to the retirement of ASCII ccTLD is derived from RFC 1591 (removal of the country code form the ISO		

		retirement policy to become applicable.	3166-1 list of country & territory names). The overall policy on the selection of IDN ccTLD strings includes the criteria for selection of an IDN ccTLD string. The delegation, transfer and revocation are defined through RFC 1591 and interpreted through the FOL are applicable by the overall principles.		
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