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## AT-LARGE ADVISORY COMMITTEE

### ALAC Statement on Proposal for Latin Script Root Zone Label Generation Rules

#### Introduction

On 23 September 2021, Public Comment opened for the [Proposal for Latin Script Root Zone Label Generation Rules](#). On the same day, an At-Large [workspace](#) was created for the statement. Bill Jouris, an At-Large community member regularly participating in the At-Large Consolidated Policy Working Group (CPWG) and a member of the Latin Generation Panel (LGP), shared his knowledge on the topic, indicating there was an end user interest in responding to this Public Comment. The CPWG decided it would be in the interest of end users to develop an ALAC statement on the Public Comment, and Jonathan Zuck, ALAC Vice Chair for Policy and Co-Chair of the CPWG, volunteered to form a small drafting team for the ALAC statement on the Proposal for Latin Script Root Zone Label Generation Rules.

On [13 October 2021](#), the topics for At-Large consideration with regards to the Public Comment were presented to the CPWG. Jonathan Zuck indicated that an ALAC statement to the CPWG would be drafted on the consensus points, and called for additional feedback from contributors to the drafting team. ICANN Policy staff in support of the At-Large community created a Google Doc for drafting purposes, and shared the draft statement to its [workspace](#) and on the weekly [CPWG agenda](#).

On [17 November 2021](#), the drafting team noted the final ALAC statement would be circulated to the CPWG. The CPWG provided final input on the At-Large points of consensus, and ICANN Policy staff in support of the At-Large community issued a final call for comments to the CPWG and ALAC mailing lists.

On 19 November 2021, the ALAC statement was finalized. The ALAC Chair, Maureen Hilyard, requested that the statement be ratified by the ALAC for submission to ICANN Public Comment.

On 22 November 2021, staff confirmed the online vote resulted in the ALAC endorsing the statement with 11 votes in favor, 0 votes against, and 1 abstention. Please note 80% (12) of the 15 ALAC Members participated in the poll. The ALAC Members who participated in the poll are (alphabetical order by first name): Carlos Aguirre, Holly Raiche, Joanna Kulesza, Jonathan Zuck, Laura Margolis, Matthias Hudobnik, Maureen Hilyard, Naveed Bin Rais, Pari Esfandiari, Raymond Mamattah, Sarah Kiden, and Sindy Obed. Three ALAC Members, Dave Kissoondoyal, Gregory Shatan and Marita Moll, did not participate in the poll. You may view the result independently under:

<https://www.bigpulse.com/pollresults?code=1344168aZBtU7LkJE4gtLzfXYHW>

## **ALAC Statement on Proposal for Latin Script Root Zone Label Generation Rules**

The At-Large Advisory Committee (ALAC) welcomes the opportunity to comment on the proposed Latin Script Root Zone Label Generation Rules. The ALAC appreciates the efforts of the Latin Generation Panel (LGP) but questions some of the instructions received by and assumptions made by the panel. These “quirks” have led to a proposal that might not be the best for multilingual expression or the mitigation of DNS abuse.

### **Principle of Least Astonishment**

The principle of least astonishment proposes that a component of a system should behave in a way that most users will expect it to behave. The now expert nature of the Latin GP suggests that it is no longer, if ever, representative of “most users.” Therefore, establishing a high bar for possible confusion is counter intuitive. If even a single Panel member considers that two code points should be a variant, that conclusion should be applied to the Panel findings. Otherwise, the Panel is implying that non-experts will be more successful in spotting differences than some of its experts. This is an entirely unreasonable expectation of a *typical* end user and making this assumption further paves the way for misdirection and consequent DNS abuse.

### **Underlining**

The Latin GP has concluded that underlining of domain names (as happens routinely) does not obscure diacritics below the line. While *some* software products put a blank space around such diacritics, it is not at all clear that end users are cognizant of this practice. Furthermore, many software products, including ICANN’s own Public Comment system, do not use these spaces. Accordingly, the ALAC recommends revising that conclusion.

### **Capital Letters**

The ALAC notes, in the Latin Generation Panel’s report, that the Internationalized Domain Name (IDN) Project has directed the Generation Panels (GPs) to ignore upper case letters when identifying variants. The apparent rationale for this direction is that domain names are restricted to lower case. Unfortunately, a half century of experience has taught end users that, in a domain name, upper and lower case are entirely interchangeable. Thus, a domain name of `www.example.com` and of `www.example.COM` will take the user to the same place. The users neither know nor care that this is an artifact of their browser, rather than a feature of the DNS.

As a result, if the user is presented with a domain name using Cyrillic lower case for the TLD, such as `www.example.com`, they will naturally interpret it to be the usual `.com`, just with the TLD capitalized. What they will NOT do, despite in expectation of the IDN Project, is look at the TLD and notice the third letter doesn’t look like a Latin lower case M and conclude this is not a `.com` domain name. The potential for DNS abuse is obvious.

Accordingly, the ALAC encourages the LGP to revisit the instructions, attributed to the IDN Project, and consider treating capital letters as a special case.

### **Repertoire**

The objective of the IDN Project is to make domain names available in the languages of all non-native speakers of English. To restrict the repertoire for the Latin script to less than half of the living languages which use that script is contrary to that goal. The ALAC believes that the LGP should go back and include all of the languages which use the Latin script. (At a minimum, languages which have more native speakers than the smallest of the “official languages” which are already included, should be added.) For example, Hawaiian has perhaps 25,000 native speakers, but is included because it is an official language of the State of Hawaii, despite the stated threshold of 1 million speakers.

## **Conclusion**

It is the considered position of the ALAC that, while great strides have been made by the Latin Generation Panel, more must be done to enable more users, with sufficient security, to use the DNS. Again, we appreciate the opportunity to comment on the draft proposal and look forward to further discussions on this topic.

*The ALAC Recommends the Latin Generation Panel (LGP) to:*

- *Establish a lower bar for possible confusion, as they are the experts - not typical end users.*
- *Revise their conclusion that the underlining of domain names (as happens routinely) does not obscure diacritics below the line.*
- *Revisit the instructions attributed to the IDN Project, and consider treating capital letters as a special case.*
- *Include all of the languages which use the Latin script - at a minimum, languages which have more native speakers than the smallest of the "official languages" which are already included, should be added.*