Consistent definition and technical utilization of RZ-LGR

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| **CHARTER QUESTIONS** |

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| **a1)** Evaluating all TLDs using RZ-LGR as the one and only authoritative source allows for a consistent approach for reviewing current and future TLDs. The SubPro PDP, the Staff Paper, and the Study Group on Technical Use of RZ-LGR (“TSG”) recommend that compliance with RZ-LGR (RZ-LGR-4, and any future RZ-LGR versions) must be required for the validation of all future gTLDs (including IDN and ASCII labels) and the calculation of their variant labels as a matter of policy, including the determination of whether the disposition of the label should be blocked or allocatable.[[1]](#footnote-1)  For existing delegated gTLD labels, does the WG recommend using the RZ-LGR as the sole source to calculate the variant labels and disposition values? |

* The working group agreed to return to this charter question after the relevant data and metrics are available to support further deliberations.
* WG members from the RySG and ccNSO will check with their groups to see if there are any concerns about using the RZ-LGR for existing gTLDs.

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| **a2)** Before the proposed RZ-LGR mechanism, applications for IDN gTLDs have asked the applicant to identify and list any variant labels (based on their own calculations) corresponding to the applied-for string. The self-identified “variant” labels do not have legal standing, as “[d]eclaring variant strings is informative only and will not imply any right or claim to the declared variant strings.”[[2]](#footnote-2) The TSG recommends that the self-identified “variant” labels which are also variant labels calculated by RZ-LGR will need to be assigned a variant disposition based on RZ-LGR calculation, as discussed in **a1)**.  If some self-identified “variant” TLD labels by the former gTLD applicants are not found consistent with the calculation of the RZ-LGR, but have been used to certain extent (e.g., used to determine string contention sets), how should such labels be addressed in order to conform to the LGR Procedure and RZ-LGR calculations? Consider this question by taking into account the data to be collected in the “Data and Metric Requirements” section of this charter. |

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| **a3)** SubPro PDP recommends that ICANN establish a mechanism that allows specific parties to challenge or appeal certain types of actions or inactions that appear to be inconsistent with the Applicant Guidebook.[[3]](#footnote-3) SubPro PDP recommends that such a limited challenge/appeal mechanism applies to several types of evaluations and formal objections decisions, including the DNS Stability aspect of evaluation/challenge procedures. Previously, both the SSAC and TSG also recommended a challenge process for resolving disagreement with the RZ-LGR calculation on certain strings.[[4]](#footnote-4)  If an applied-for TLD label, whose script is supported by the RZ-LGR, is determined to be “invalid”, is there a reason NOT to use the evaluation challenge processes recommended by SubPro? If so, rationale must be clearly stated. If SubPro’s recommendation on the evaluation challenge process should be used, what are the criteria for filing such a challenge? Should any additional specific implementation guidance be provided, especially pertaining to the challenge to the LGR calculation as it can have a profound, decimating impact on the use of RZ-LGR?[[5]](#footnote-5) |

* From one perspective, at a high level, applicants should have an opportunity to challenge all types of evaluation decisions in the New gTLD Program, and this evaluation element should not be an exception.
* The working group considered several [potential scenarios](https://docs.google.com/spreadsheets/d/1m2OKyXsHa9pfyBz2u44UTTSYjAbuxe_FHCsK9LUKPVI/edit#gid=0) for a challenge: 1. Applied-for gTLD is found to be invalid 2. Applied-for variant TLD is found to not be an allocatable variant. 3. A string is found to not be a blocked variant.
* It was noted that if the outcome of challenges require an update to RZ-LGR, the update process is already defined by the RZ-LGR process. Creating a process outside of this could be detrimental to the RZ-LGR itself. Therefore, if the working group recommends that challenges are possible as part of the New gTLD Program, and such a challenge is triggered by an applicant, it may still need to go through the RZ-LGR process.
* If the RZ-LGR process is triggered, should it still be possible to proceed with the application in the same round?
  + Yes: There may be a significant period of time between rounds. If the RZ-LGR process concludes and the applied-for string is ultimately eligible to proceed, it should be able to do so as part of the same round without paying a new fee. If there is an error in the RZ-LGR, this is not the applicant’s fault, and the applicant should not be required to go through the whole application process again. As contention is not likely, waiting will not hold up other applications in many cases. If the string in question IS in a contention set, it is unfair to make the applicant lose their place in the contention set for that round, as another applicant in the contention set will proceed, making it impossible for the applicant in question to apply for their desired string in the next round.
  + No: The RZ-LGR process might take time. If the application is considered “on hold” during that period, it will also hold up any other applications in contention with it for an indefinite period of time. It is expected that rounds will occur and regular, frequent intervals, so it should be possible for the applicant to quickly apply again.
* From one perspective, if the string was found to be invalid due to an error in the application (for example a typo), the applicant should be able to correct the error and proceed in the same round. From another perspective, it is unlikely that an applicant would mistype the applied for string in the application. It is more likely that they apply for a string that is simply invalid. If the working group wants to permit applicants to change the applied for string, it will be necessary to put specific limitations around the types of changes that can be accepted.

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| **a4)** For future gTLD applications, the SubPro PDP proposes an implementation guidance that if a script is not yet integrated into the RZ-LGR, applicants should be able to apply for a string in that script, and it should be processed up to but not including contracting.[[6]](#footnote-6) Applicants under such circumstances should be warned of the possibility that the applied-for string may never be delegated and they will be responsible for any additional evaluation costs. The burden in this case is on the applicant, who may have to wait for an indeterminate amount of time but is not aware of any other serious concerns. The SubPro PDP developed this implementation guidance by taking into consideration the TSG recommendation that the application should remain on-hold (or other appropriate status) until the relevant script is integrated into the RZ-LGR.[[7]](#footnote-7)  The WG and the SubPro IRT to coordinate and consider the following questions in order to develop a consistent solution: should the SubPro recommendation be extended to existing TLDs that apply for a variant TLD label whose script is not yet supported by the applicable version of the RZ-LGR? Consider this question in tandem with **b4)** and by taking into account the data to be collected in the “Data and Metric Requirements” section of this charter. If not, what should be the process for an existing TLD registry who wishes to apply for a variant TLD label whose script is not yet supported by the applicable version of the RZ-LGR? |

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| **a5)** SAC060 notes that variant code points in LGR may introduce a “permutation issue”, possibly creating a large number of variant domain names, which “presents challenges for the management of variant domains at the registry, the registrar and registrant levels.”[[8]](#footnote-8) SAC060 advises that “ICANN should ensure that the number of strings that are activated is as small as possible.” The TSG agreed with this SSAC advice.[[9]](#footnote-9) Appendix C of the Staff Paper reviewed the factors causing numerous variant labels and suggested measures to address this issue.[[10]](#footnote-10)  Should there be a ceiling value or other mechanism to ensure that the number of delegated top-level variant labels remains small, understanding that variant labels in the second level may compound the situation? Should additional security and stability guidelines be developed to make variant domains manageable at the registry, registrar, and registrant levels?[[11]](#footnote-11) |

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| **a6)** Since RZ-LGR can be updated over time, the WG needs to consider the implications for existing TLD labels and their variant labels (if any), including any potential changing of status or disposition value.[[12]](#footnote-12)  The TSG further recommends that the Generation Panel (GP) must call out the exception where an existing TLD is not validated by their proposed solution during the public comment period and explain the analysis and reasons for not supporting the existing TLD in their script LGR proposal.[[13]](#footnote-13) This will allow the community and the GP to review such a case to confirm that an exception is indeed warranted.  Does the WG agree with TSG’s suggested approach? If so, to what extent should the TLD policies and procedures be updated to allow an existing TLD and its variants (if any), which are not validated by a script LGR, to be grandfathered? If not, what is the recommended approach to address changes to the current version of the RZ-LGR that assign different disposition values to existing TLDs? Consider this question by taking into account the data to be collected in the “Data and Metric Requirements” section of this charter. |

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| **a7)** The SubPro PDP recommends that single character gTLDs may be allowed for limited script/language combinations where a character is an ideograph (or ideogram) and do not introduce confusion risks that rise above commonplace similarities, consistent with SAC052 and Joint ccNSO-GNSO IDN Workgroup (JIG) report.[[14]](#footnote-14)  What mechanism or criteria should be used to identify the scripts/languages appropriate for single-character TLDs? Once those scripts/languages are identified, what mechanism or criteria should be used to identify a specific list of allowable characters which can be used as a single-character TLD within such scripts/languages? Should any specific implementation guidance be provided? Furthermore, should the relevant GP tag these code points in the RZ-LGR for a consistent analysis and to ease their identification and algorithmic calculation?[[15]](#footnote-15) |

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| **a8)** What additional aspects of gTLD policies and procedures, which are not considered in the above charter questions, need to be updated to ensure that the validation of existing TLD labels and calculation of variant labels depend exclusively on the RZ-LGR in a consistent manner? |

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| **a9)** A given label in an Internationalized Domain Label (IDL) set may be in one of the following non-exhaustive status: delegated, withheld-same-entity, blocked, allocated, rejected. The WG and the SubPro IRT to coordinate and develop a consistent definition of variant label status in the IDL set. |

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| **a10)** Individual labels in an IDL set may go through the following possible status transformations:   * **from “withheld-same-entity” to “allocated”:** Allocation only to the same entity as another label in the IDL set. This change happens if a variant was not initially requested for allocation and later is. Allocating withheld labels would be the application process for a variant TLD. * **from “blocked” to “withheld-same-entity”:** A later LGR may broaden the available labels in the IDL set. Such possible labels automatically become withheld-same-entity. * **from “allocated” to “delegated”:** Happens when name servers are added. (Not new.) * **from “delegated” to “allocated”:** If a domain is removed from the DNS, the allocation can remain in place anyway. Rare in the root zone, but not new. * **from “rejected” to “withheld-same-entity”**: Every Rejected label is automatically Withheld-same-entity as well. If the Rejected status comes off, the label can be handled as any other Withheld-same-entity label.   Note that an allocated or withheld-same-entity label cannot become blocked unless a new version of the LGR makes this possible.  The WG and the SubPro IRT to coordinate and consider the following questions in order to develop a consistent solution: what is the procedure to change the label status for individual variant labels? |

1. See Recommendation 25.2 and Implementation Guidance 26.10 in the SubPro Final Report, pp.115, 119: <https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf#page=115>; Recommendation 1 in the Staff Paper, p.3: <https://www.icann.org/en/system/files/files/idn-variant-tld-recommendations-analysis-25jan19-en.pdf#page=3>; Recommendation 1 in the TSG report, p.5: <https://www.icann.org/en/system/files/files/rz-lgr-technical-utilization-recs-07oct19-en.pdf#page=5> [↑](#footnote-ref-1)
2. For more details see *gTLD Applicant Guidebook*, version 2012-06-04, section 1.3.3 IDN Variant TLDs, p.1-35: <https://newgtlds.icann.org/en/applicants/agb/guidebook-full-04jun12-en.pdf> [↑](#footnote-ref-2)
3. See Recommendation 32.1 in the SubPro Final Report, pp.154-155: <https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf#page=154> [↑](#footnote-ref-3)
4. Disagreement with the LGR calculator may arise due to circumstances including but not limited to: an invalid label due to choice of "letter" not included in the repertoire, albeit being IDNA2008 protocol-valid; an invalid label due to a contextual or whole label evaluation rule imposed by either integration or generation panels’ variant; labels differ because of different assumptions. SAC060 proposed a straw man process to resolve disputes to the RZ-LGR results. The TSG recommended several technical inputs be considered when developing the resolution mechanism. See Recommendation 2, SAC060, p.9: <https://www.icann.org/en/system/files/files/sac-060-en.pdf#page=9>; see Recommendation 4 in the TSG Report, pp.6-7: <https://www.icann.org/en/system/files/files/rz-lgr-technical-utilization-recs-07oct19-en.pdf#page=6> [↑](#footnote-ref-4)
5. Any changes in RZ-LGR brought about by a process outside the LGR Procedure would invalidate the RZ-LGR and thus the definition of the variant TLD, as stated in the LGR Procedure. TSG suggests how to address such a challenge by remaining within the LGR Procedure. [↑](#footnote-ref-5)
6. See Implementation Guidance 25.3 in the SubPro Final Report, p.115: <https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf#page=115> [↑](#footnote-ref-6)
7. It is important to recognize that the RZ-LGR can be updated to include additional scripts as long as it is done in compliance with the LGR Procedure. The practical limitation, however, is that the time to create an LGR script proposal varies greatly (i.e. months or years). See Recommendation 5 in the TSG report, p.7: <https://www.icann.org/en/system/files/files/rz-lgr-technical-utilization-recs-07oct19-en.pdf#page=7>; for additional context and rationale, see Appendix A of the Recommendations for Technical Utilization of RZ-LGR, pp.11-12: <https://www.icann.org/en/system/files/files/rz-lgr-technical-utilization-recs-07oct19-en.pdf#page=11> [↑](#footnote-ref-7)
8. See Recommendation 14, SAC060, p. 20: <https://www.icann.org/en/system/files/files/sac-060-en.pdf#page=20> [↑](#footnote-ref-8)
9. See Recommendation 6 in the TSG report, p.7: <https://www.icann.org/en/system/files/files/rz-lgr-technical-utilization-recs-07oct19-en.pdf#page=7> [↑](#footnote-ref-9)
10. See Appendix C of the IDN Variant TLD Implementation: Appendices, pp. 12-29: <https://www.icann.org/en/system/files/files/idn-variant-tld-appendices-25jan19-en.pdf#page=12> [↑](#footnote-ref-10)
11. One of the security and stability concerns is that some scripts can generate large numbers of variants based on the way the LGR works. The RZ-LGR Procedure manages such numbers by minimizing allocatable variant labels and maximizing blocked variant labels. However, though this approach is optimal in most cases, the outcome may be worse for a specific label in some cases. [↑](#footnote-ref-11)
12. See Recommendation 7 in the TSG report, p.8: <https://www.icann.org/en/system/files/files/rz-lgr-technical-utilization-recs-07oct19-en.pdf#page=8> [↑](#footnote-ref-12)
13. See Recommendation 12 in the TSG report, p.9: <https://www.icann.org/en/system/files/files/rz-lgr-technical-utilization-recs-07oct19-en.pdf#page=9> [↑](#footnote-ref-13)
14. See Recommendation 25.4 in the SubPro PDP Final Report, p.115:<https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf#page=115>; Recommendation 1 in SAC052, p.8: <https://www.icann.org/en/system/files/files/sac-052-en.pdf#page=8>; the SubPro PDP does not believe it has the relevant expertise to make this determination and would welcome the identification of the limited set of scripts and languages and potentially a specific list of allowable single-characters (e.g., during implementation), which will substantially increase the predictability of what will likely still remain a case-by-case, manual process. See Rationale for Recommendation 25.4 in the SubPro PDP Final Report, pp.116-117: <https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf#page=116> [↑](#footnote-ref-14)
15. See Annex B of the Recommendations for the Technical Utilization of the RZ-LGR, p.13: <https://www.icann.org/en/system/files/files/rz-lgr-technical-utilization-recs-07oct19-en.pdf#page=13> [↑](#footnote-ref-15)