

# **Expedited Policy Development Process on Internationalized Domain Names (EPDP on IDNs)**

## **Recap of 24 Nov 2011 Presentation and Q&A for At-Large CPWG**

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# Agenda

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- ⦿ Opening Remarks / Commentary
  
- ⦿ Status of EPDP deliberations as at 18 Nov 2021
  - Topic A of Charter:  
Consistent definition and technical utilization of RZ-LGR
  - CQ a1: Use RZ-LGR on existing delegated gTLDs?
  - CQ a2: Is Use of RZ-LGR affected by self-identified “*variant*” labels?
  - CQ a3: Allow “challenges” to RZ-LGR calculations?
  
- ⦿ Q & A

## CQ a1: Use RZ-LGR on existing delegated gTLDs?

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- ⊙ **CQ a1: For existing delegated gTLD labels, use RZ-LGR as sole source to calculate variant labels and disposition values?**
- ⊙ Context:
  - RZ-LGR started in 2013 i.e. was not available for 2012 round
  - SubPro PDP, TSG recommend that compliance with RZ-LGR is a must for validation of all future gTLDs (incl. IDN and ASCII labels) and calculation of their variant label as policy
- ⊙ What did data analysis show?
  - Using RZ-LGR-4, variant labels calculated for 308 delegated ccTLDs and 1,900+ delegated / applied-for gTLDs ++
  - Only 3 applied-for labels had self-identified “*variant*” labels which did not conform to RZ-LGR
  - *i.e.* significant portion of self-identified “*variant*” labels conforms to RZ-LGR, therefore using RZ-LGR as sole source poses no issues
- ⊙ **PROPOSED ANSWER: YES**

# RZ-LGR Terms: Labels, Disposition Value, Code points

A real example of RZ-LGR output for an Arabic label

#	Type	U-label	A-label	Disposition	Code point sequence
1	original	شبكة	xn--ngbc5azd	valid	U+0634 U+0628 U+0643 U+0629
2	varlabel	شبكة	xn--ngbx0cq	allocatable	U+0634 U+0628 U+0643 U+0647
3	varlabel	شبكة	xn--ngbx0c15a	blocked	U+0634 U+0628 U+0643 U+06BE
4	varlabel	شبكة	xn--ngbx0c95a	blocked	U+0634 U+0628 U+0643 U+06C0
5	varlabel	شبكة	xn--ngbx0cy6a	blocked	U+0634 U+0628 U+0643 U+06C1
6	varlabel	شبكة	xn--ngbx0c26a	blocked	U+0634 U+0628 U+0643 U+06C2
7	varlabel	شبكة	xn--ngbx0c66a	allocatable	U+0634 U+0628 U+0643 U+06C3
8	varlabel	شبكة	xn--ngbx0c31b	blocked	U+0634 U+0628 U+0643 U+06D5
9	varlabel	شبكة	xn--ngbc5az1b	allocatable	U+0634 U+0628 U+06A9 U+0629
10	varlabel	شبكة	xn--ngbx2d5u	allocatable	U+0634 U+0628 U+06A9 U+0647
11	varlabel	شبكة	xn--ngbx66ayc	blocked	U+0634 U+0628 U+06A9 U+06BE
12	varlabel	شبكة	xn--ngbx66a6c	blocked	U+0634 U+0628 U+06A9 U+06C0
13	varlabel	شبكة	xn--ngbx66agd	blocked	U+0634 U+0628 U+06A9 U+06C1
14	varlabel	شبكة	xn--ngbx66akd	blocked	U+0634 U+0628 U+06A9 U+06C2
15	varlabel	شبكة	xn--ngbx66aod	allocatable	U+0634 U+0628 U+06A9 U+06C3
16	varlabel	شبكة	xn--ngbx66a0f	blocked	U+0634 U+0628 U+06A9 U+06D5
17	varlabel	شبكة	xn--ngbc5a31b	allocatable	U+0634 U+0628 U+06AA U+0629
18	varlabel	شبكة	xn--ngbx2d9u	allocatable	U+0634 U+0628 U+06AA U+0647
19	varlabel	شبكة	xn--ngbx96asc	blocked	U+0634 U+0628 U+06AA U+06BE
20	varlabel	شبكة	xn--ngbx96a0c	blocked	U+0634 U+0628 U+06AA U+06C0
21	varlabel	شبكة	xn--ngbx96a4c	blocked	U+0634 U+0628 U+06AA U+06C1
22	varlabel	شبكة	xn--ngbx96a8c	blocked	U+0634 U+0628 U+06AA U+06C2
23	varlabel	شبكة	xn--ngbx96ahd	allocatable	U+0634 U+0628 U+06AA U+06C3
24	varlabel	شبكة	xn--ngbx96arf	blocked	U+0634 U+0628 U+06AA U+06D5

## CQ a2: Use of RZ-LGR affected by self-identified “*variant*” labels?

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- ⊙ **CQ a2: How should we address self-identified “*variant*” TLD labels in order to conform to the LGR Procedure and RZ-LGR calculations?**
- ⊙ Context:
  - If some such self-identified “*variant*” labels from 2012 round are found inconsistent with RZ-LGR calculations but nonetheless (may) have been used to some extent (eg. to determine string contentions sets), what should we do?
  - All such self-identified *variant* TLD labels have no legal standing
- ⊙ What did data analysis show?
  - Significant portion of self-identified “*variant*” labels conforms to RZ-LGR
- ⊙ **PROPOSED ANSWER: NO FURTHER ACTION NEEDED.**
  - Doesn't matter if self-identified “*variant*” labels were used for any purpose (if at all), since they carry no legal standing, ICANN is not obligated to consider them in any way.

## CQ a3: Allow “challenges” to RZ-LGR calculations? (1/4)

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- ⊙ **CQ a3 has several parts:**

- **If an applied-for TLD label – whose script is covered by RZ-LGR – is found “invalid”, is there reason not to use evaluation challenge process recommended by SubPro?**
- **If not used, what’s the rationale for non use?**
- **If used, what’s the criteria for filing challenge? Any additional implementation guidance for challenge?**

- ⊙ **Context:**

- 2012 round included 6 evaluations in the initial evaluation phase, all by 3<sup>rd</sup> third party evaluation panels
  - Applicant / label must pass all applicable evaluations as applicable
  - DNS Stability Panel (DSP) did review all applied-for labels for ASCII and IDN requirements conformity
- 2012 round did not provide for challenges to evaluation panel decisions
  - Applicants ended up using ICANN Accountability Mechanisms to ventilate grievances
- SubPro PDP recommended a limited challenge process be created
  - Included elements: what, standing, arbiter, possible outcomes, costs, review standard

## CQ a3: Allow “challenges” to RZ-LGR calculations? (2/4)

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- ⦿ What did EPDP “conclude”? 3 high level points:
  1. An applicant can challenge an evaluation determination by the DNS Stability Panel (DSP) that the applied-for TLD label, whose script is supported by the RZ-LGR, is “invalid”
  2. Eligibility for filing such a challenge is limited to applicant’s belief that the DSP has incorrectly assessed the label as “invalid”\*\*
  3. The evaluation challenge processes and criteria applicable to the DSP Review recommended by SubPro PDP should be used for such a challenge
  
- ⦿ **PROPOSED ANSWER: Agree with the 3 high level points, but will advocate for point 2\*\* to clearly include an explanation that eligibility to challenge is limited to incorrect assessment pertaining ONLY to errors in technical implementation of the RZ-LGR (i.e. “programming errors” in implementing the algorithmic tool in the application submission system)**

Meaning: Only incorrect assessment due to algorithmic tool error can be challenged; but not the RZ-LGR itself.

## CQ a3: Allow “challenges” to RZ-LGR calculations? (3/4)

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### ⦿ Our rationale:

#### **(a) Our understanding of principles and workings of the RZ-LGR workings**

Per presentations by I\*Org’s Sarmad Hussain and Pitinan Kooarmornpatana on RZ-LGR Motivation, Design, Usage & Status; and LGR Tool demo

- EPDP Call #9 on 7 Oct: <https://community.icann.org/display/epdpidn/2021-10-07+IDNs+EPDP>
- EPDP Call #10 on 13 Oct: <https://community.icann.org/display/epdpidn/2021-10-14+IDNs+EPDP>

#### **(b) Our understanding of applicability of various assumptions re: RZ-LGR vis a vis the DSP**

- Initial algorithmic check (using LGR Tool) incorporated in application submission system – checks for validity of applied-for labels
- DSP will still perform manual review on all applied-for labels, in the case of IDN labels, using RZ-LGR, for conformity and makes determination on label validity
- DSP’s evaluation is authoritative – applications for invalid labels will be disqualified – acts as trigger for limited challenge process per SubPro PDP recommendations

#### **(c) Our reading of purpose of SubPro’s challenge process**

- To allow addressing of grievances against evaluation panel determinations under set criteria, which are better suited for purpose



## CQ a3: Allow “challenges” to RZ-LGR calculations? (3/4)

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### ⦿ Our rationale:

#### **(d) Our belief that authoritativeness of RZ-LGR itself (i.e. content of rule) must always prevail**

- Needed to protect integrity, security, stability of RZ-LGR and DNS
- So, an applicant’s grievances which suggest that content of rule is wrong or incomplete is outside the scope of the DSP
- Such grievances should be handled – “request for change to RZ-LGR” – by relevant script GP, IP using existing RZ-LGR Procedure

#### **(e) Our understanding and belief that requests for change to RZ-LGR” can and should happen outside of the New gTLD Program & application process**

- Initial algorithmic check (using LGR Tool) already available for anyone to check label validity – is in everyone’s best interest to initiate “request for change to RZ-LGR” before next application window opens

#### **(f) Our acquiescence to applicant being allowed to proceed even if initial algorithmic check says label is invalid**

- To cater to edge cases where DSP may intervene if it determines that the initial algorithmic check produced a wrong result
- Provided label meets other mandatory string requirements and IDNA 2008 requirements

**Thank you for your  
questions and input.**