

IDNs EPDP Questions for Meeting with SSAC Members - 13 January 2022

*This document includes an excerpt of relevant IDNs EPDP charter questions. The complete text of the questions are included in the charter [here](#).

** Early input received from the SSAC can be found [here](#).

Applicable Charter Question(s): A1 & A4

A1: 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?

A4: 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? 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?

Question(s) from: Dennis Tan Tanaka

The Root Zone LGR procedure defines a Maximal Starting Repertoire —a subset of IDNA protocol valid code points— of which any given script LGR repertoire selects the allowable code points. The final product is merged into the Root Zone LGR, the code point repertoire of which could be smaller or identical to the Maximal Starting Repertoire, but never larger.

Can SSAC elaborate on their comments to questions a1 and a4? on one hand (a1) SSAC recommends "the root zone must use one and only one set of rules for the Root LGR procedure". On the other hand (a4) SSAC is of the opinion that "there is no reason to prohibit" an application so long it is allowed by IDNA, albeit variant labels will remain disallowed. Is SSAC of the opinion that this should apply to any IDN application in the future — an IDN label should not be prohibited so long its code points are IDNA valid?

Applicable Charter Question(s): A2

A2: 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?

Question(s) from: IDNs EPDP Team

It may be helpful to clarify the following SSAC early input: “An analysis of the delegated variant labels in ccTLDs against the most current version of LGR would answer whether this is a hypothetical question or not.”

Since the character question is asking in the context of gTLDs, regarding the reference of “delegated variant labels in the ccTLDs”, does the SSAC actually mean “syncrohimized TLDs”, or perhaps “self-identified variant gTLD labels identified by the gTLD applicants from the 2012 round”?

Applicable Charter Question(s): A5 & C2

A5: 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?

C2: How does the “same entity” requirement impact the current rules for Registry Operators for activating IDN variant labels?

Question(s) from: ALAC Members on the EPDP Team

SAC060 Recommendation 14 says, “*ICANN should ensure that the number of strings that are activated is conservative*”; and goes on to rationalize that:

“*Variants introduce a permutation issue both at top level as well as with combinations of the top level and second level*”, giving the following example:

- A TLD string with 4 char with 3 variants each, produces a variant set of 81 different strings ($3^4 = 81$)
- An SLD (under such above TLD) with 4 char with 3 variants each, produces a variant set of 72,171 different strings ($3^4 \times 3^4 = 72,171$)

and that “[s]uch a large number of variant strings present challenges for management of variant domains at the registry, the registrar and registrant levels.”

Question #1: Could the authors please elaborate, by using a theoretical example, on the nature of the challenges in managing variant domains at registry, the registrar and registrant levels?

In agreeing with the user experience report recommendation that ICANN must implement a conservative variant TLD allocation process, SSAC suggests:

- In SAC060, that “*A variant TLD application must be accepted only if the TLD applicant clearly demonstrates the necessity for activating the string. Variants that are not necessary, but are desired, must not be allocated and activated*” and

- In SSAC2021-09, that “*..there should be a mechanism to ensure that the number of delegated top-level variant labels remains small. Unless there is demonstrated widespread usage of the variant label, the variant label should not be activated.*”

Question #2: Could the authors please suggest criteria for or provide examples of what constitutes a demonstration of “the necessity for activating the string” or “widespread usage of the variant label”?

Applicable Charter Question(s): A5

A5: 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?

Question(s) from: Jeff Neuman

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.”

SAC060 advises that “ICANN should ensure that the number of strings that are activated is as small as possible.

1. Although this advice sounds like it is sensible:
 - a. How can this practically be implemented?
 - b. What does “As small as possible” really mean?
 - c. Who determines what is “as small as possible” means?
 - d. What is a number that would be anything other than arbitrary?
2. According to the Rationale, it appears that the SSAC is presenting this advice to protect registries, registrars and registrants from themselves. In other words, the advice assumes that registries, registrars and registrants will want to activate more strings than they would be able to handle.
 - a. Normally all policy starts from the basic presumption that each of the actors involved will act in a rational manner and in their own best interests. This is the basis of all business and economic theory. But this policy recommendation takes the opposite view and starts from the premise that registries, registrars and registrants will essentially try to activate more than they can handle and thus we need to protect them from themselves. Is there any evidence upon which that assumption is based?
 - b. Given no proof that registries will intentionally activate more strings than they can handle, should we really be placing any artificial limits?

- c. Assuming we either have or do not have a limit, how do we determine when a registry, registrar or registrant has more challenges than they can handle? What do we do? Is this really an ICANN problem?
- d. Finally, given all of the above, shouldn't we allow registries, registrars, and registrants to figure out what it is that they can handle as opposed to placing an arbitrary limit?

Applicable Charter Question(s): B3 & C4a

B3: Beyond having the same Registry Operator and same back-end registry service provider, as referenced in b1) and b2), is there a need for additional constraints for the same entity requirement for the top-level? If so, the rationale must be clearly stated

C4a: May the set of allocatable or activated second-level variant labels not behave identically under an individual TLD, which does not have any variant TLD label?

Question(s) from: IDNs EPDP Team

SSAC members are welcome to further elaborate on the following early input: "The SSAC wishes to emphasize that currently there is no DNS protocol solution that enforces equivalence (or the same behavior) of variants in the DNS. Policy makers need to understand this crucial limitation, so as not to design policies that attempt to force such equivalence...So in essence, although administratively these domains are considered a package, technically speaking, they are different domain names."