EPDP on IDNs

Discussions on Charter Questions A5 and A6

ALAC Team for EPDP on IDNs

A5: Should there be a ceiling on variants?

- SAC060 recommendation was that “ICANN should ensure that the number of strings that are activated is as small as possible”. The TSG agreed with this
- There was general agreement within the EPDP Team that:
  - Only a limited number of scripts (7 out of 25) are impacted by the potential overproduction of allocatable variant labels because of built-in internal restrictions by GPs to limit variants to 2-4 (except for Arabic).
  - There should not be ceiling values beyond the existing measures imposed by the RZ-LGR to reduce the number of allocatable top-level variant labels.
  - However, there should be additional guidance to make variant domains manageable at the registry, registrar, and registrant levels, to ensure consistent user experience.
- It was also pointed out that deciding on any particular number for a ceiling would be artificial and arbitrary
- SSAC Members also agreed during discussions that there is no technical reason to prohibit larger number of variants from a security or stability standpoint (but they did mention that manageability becomes a constraint for registries if numbers go up)

A5: Draft recommendations (and comments from Team)

Recommendation 1.4:
No ceiling value is necessary as existing measures in the RZ-LGR to reduce the number of allocatable top-level variant labels and market forces combined will keep the number of activated top-level variant labels conservative.

- Without a ceiling value, there is a possibility that we are opening the doors for DNS abuse especially in terms of confusability wherein if there are large numbers of variants, it would be harder to differentiate between variants and DNS abuse attempts
- “Market forces” as a policy instrument is somewhat vague without a clear definition of its specific nature. Besides, market forces apply to all ICANN policy and it is unclear why this would be a special case.

On the GPs self-imposed restriction on variants (possibly outside the remit of the EPDP):

- On what basis have these script communities decided on 2-4? Why not 0-3 or 1-2?
- Why has Arabic not adopted such an internal restriction?

A5: Draft Recommendations

Recommendation 1.5:

Best practice guidelines be developed for the management of a gTLD and its variant labels by registries and registrars with a view to ensuring a consistent user experience.

- We agree that additional guidance would be required for registries, registrars and registrants when IDN variant TLDs are introduced. We have the following questions on this:
  - Are the proposed Best Practices Guidelines only for manageability, or are these also for other technical, legal or operational reasons introduced by the adoptions of IDN variants?

A6: What if a future RZ-LGR update breaks existing IDNs?

- The work of GPs is dependent on two standards (RFC 5891 aka IDNA 2008 and Unicode) as well as possibly the changing requirements of the script community
- Although very unlikely, it is possible that a future update to the RZ-LGR changes the status or disposition values of existing TLD labels and their variants
- The TSG recommends that the GP explains through a public comments process the reason for, and the impact of, such an exceptional event
- The CQ asks:
    - To what extent should the TLD policies and procedures be updated to allow an existing TLD and its variants, 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?

A6: Recommendations

Recommendation 1.6: Any existing gTLDs and their delegated and allocated variant labels (if any) not validated by a proposed RZ-LGR update **must be grandfathered**. In other words, the proposed update will apply to future new gTLDs and their variant labels and **will not be retrospective**; there will be **no change to the contractual and delegation status of existing gTLDs** and their delegated and allocated variant labels, which predate the proposed RZ-LGR update and are subject to the version of RZ-LGR when those labels were delegated or allocated.

We accept the concept of Grandfathering, but more information will come to light when we deal with other CQs. We may revisit the topic later on.

A6: Recommendations

Recommendation 1.7: For all future versions of the RZ-LGR, Generation Panels (GPs) and the Integration Panel must make best effort to retain full backward compatibility with existing gTLDs and their delegated and allocated variant labels (if any). The LGR Procedure must be updated to specify the exceptional circumstances that could result in a proposed update to the RZ-LGR not being able to retain full backward compatibility.

Agree with the text. However, it is unclear if a given script community can predict the “exceptional circumstances” (apart from the dependencies on IDNA2008 and Unicode standards) that could result in breaking backwards compatibility in order to update the LGR Procedure.

A6: Recommendations

Recommendation 1.8: In the unexpected event where a proposed update of the RZ-LGR is unable to retain full backward compatibility for validating any existing gTLDs as well as their delegated and allocated variant labels (if any), the relevant GP must call out the exception during a public comment period and explain the reasons for such exception. The public comment period should also include the elements in the following Implementation Guidance.

We agree with the public comment process to inform the communities concerned about the exceptional situation.

A6: Implementation Guidance

Implementation Guidance 1.9: The GP analysis should identify security and stability risks (if any), as well as possible actions to mitigate the risks (if known and understood by the GP) associated with allowing an existing gTLD and their delegated and allocated variant labels to be grandfathered.

Agree that analysis of the impact and mitigation strategies must be undertaken. However, it is unclear if the GP can do this on their own, or if they should also use the services of other entities (such as ICANN org or SSAC).

A6: Implementation Guidance

Implementation Guidance 1.10: ICANN org should facilitate a dialogue between the registry operator of the grandfathered gTLD, ICANN org, and the GP, to provide an assessment of the potential impact of grandfathering on the gTLD registry operator, their customers, and end users, as well as proposed measures to reduce the impact.

Notwithstanding the recommendation to grandfather affected gTLDs, in the event security and stability risks are identified, ICANN org and the affected registry operator should discuss possible measures to minimize the risks that would result in minimal disruption to the registry operator, their customers, and end users.

Agree with the proposed language. We are not sure if the phrase “the gTLD registry operator, their customers, and end users” (used twice in the text) has any special context to it, and if it is as inclusive in comparison with “registry, registrar, registrants and end-users”.

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