

EPDP on IDNs

Discussions on Charter Questions B and D1b

ALAC Team for EPDP on IDNs

16 March 2022

B: “Same entity” at the Top Level

b1) Both the SubPro PDP and the Staff Paper recommend that variant TLDs that ICANN delegates must have the “same entity” as the sponsoring organization, and that the “Registry Operator” be used as the definition of the “same entity” at the top-level.

Should this recommendation be extended to existing TLDs?

b2) Both the SubPro PDP and the Staff Paper recommend that variant TLDs be operated by the same back-end registry service provider, the organization providing one or more registry services (e.g., DNS, DNSSEC, RDDS, EPP) for a registry operator.

Should this recommendation be extended to existing TLDs and their variant TLD labels?

Discussions

- B1 and b2 were discussed together
- The same entity principle is important to ensure protection against denial of service or “misconnection”
- The EPDP Team supports extending the SubPro and Staff Paper recommendations to existing gTLDs and their variant gTLD labels.

B3: Same Registry Services Provider

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.

- The EPDP Team agreed that no additional constraints are needed to enforce the same entity requirement for the top-level.
- The EPDP Team supported adding an implementation guidance that if there is a change to the back-end registry service provider of one variant TLD label, all variant labels of that TLD should be changed to the same back-end registry service provider simultaneously

Variant Label Process

b4) The policy recommendation advises that variant TLD labels be allocated to the same entity, **however a process to apply for a variant TLD does not exist**. The WG and the SubPro IRT to coordinate and consider the following questions in order to develop a consistent solution: what should an application process look like in terms of **timing and sequence** for an existing and future Registry Operator with respect to applying or activating their allocatable variant TLD labels?

Timing and Sequence

- Timing: For future gTLDs, when can the applicant apply for, or request activation of allocatable variant TLD labels?
 - Within an application round only
 - On a rolling basis
- Sequence: For future gTLDs, how can an applicant apply for variants or request activation?
 - In a single application, for all variants at a time
 - Label by label
- Should the entire allocatable variant set be pre-evaluated to allow for simplified activation of variants? Such pre-evaluation could also help address how variants are going to be considered in string similarity review, objection, and other processes.

D1b: Process of applying for variants

- Part 1: What should be the process by which an **existing registry operator** could apply for, or be allocated, a variant for its existing gTLD?
- Part 2: What should be the process by which **an applicant applying for a new IDN gTLD** could seek and obtain any allocatable variant(s)?
- Part 3: What should be the **associated fee(s)**, including the application fees and annual registration fees for variant TLDs? Should any specific implementation guidance be provided?

Part 1: New applicant

- General agreement that an applicant for a new gTLD and its variant label set should go through one application process, that is, only be required to submit **one application for the new gTLD and its variant label set**
- Applicant needs to prove to the evaluator that it can manage both the gTLD and its variant(s), as well as explain how it will operate the set. There should be additional application questions to address how the set will be handled
- Some members support the idea of completing the evaluation and objection of the variant set up front

Part 2: Variants of existing gTLD

- Some support for a **simplified process** before the next round to allow registry operators to seek to activate variant labels
- Processes from the 2012 round may need to be taken into account, including resource/staffing needs and evaluation elements to ensure variants are introduced and managed in a secure/stable manner
- An analysis reveals that only 61 of delegated IDN TLDs have allocatable variants, and that these represent 47 Registry Operators
- A survey has been proposed for these 47 ROs to assess the level of urgency and other related parameters (such as fees) in order to get a preliminary sense of the market

Part 3: Fees

- Some members suggested that applicants from the 2012 round have already paid the application fee of \$185,000 and this should potentially be considered in the activation of variants
- Some members stressed the “cost recovery / revenue neutral” principle
- Hard question to tackle without addressing each stage of the application process in detail

Additional considerations

- For future applicants: Should the cost of applying for the primary new gTLD and its variant labels be the cost of one application? In other words, should there be variable pricing associated with an application that includes both the primary new gTLD and its variant labels, or should the “one fee fits all” system apply?
- For existing ROs: Should existing Registry Operators be charged for their request to activate allocatable variant labels of their existing gTLDs?
- For both future applicants and existing ROs: Once delegated, what annual registration fees should be charged for the variant TLD labels?

Thank you