String Similarity Small Group Outcome

Agenda

- Overview
- Task 1
- Task 2
- Task 3
- Conclusion

Overview

Background

Charter Questions

EPDP-IDN Charter asks to consider any adjustment to the string similarity review due to the variant implementation: (Charter Question E3)

- What role, if any, do the “withheld same entity” variants play? (Charter Question E1)
- What are the potential consequences for the other allocatable variant labels in the same set of a requested variant label, which is rejected as a result of the string similarity review? (Charter Question E3a)

Staff Paper Recommendation

String similarity review should compare strings under consideration not just against all allocated or applied-for strings, but also all variants of those strings (i.e., allocatable, withheld-same-entity, and blocked).

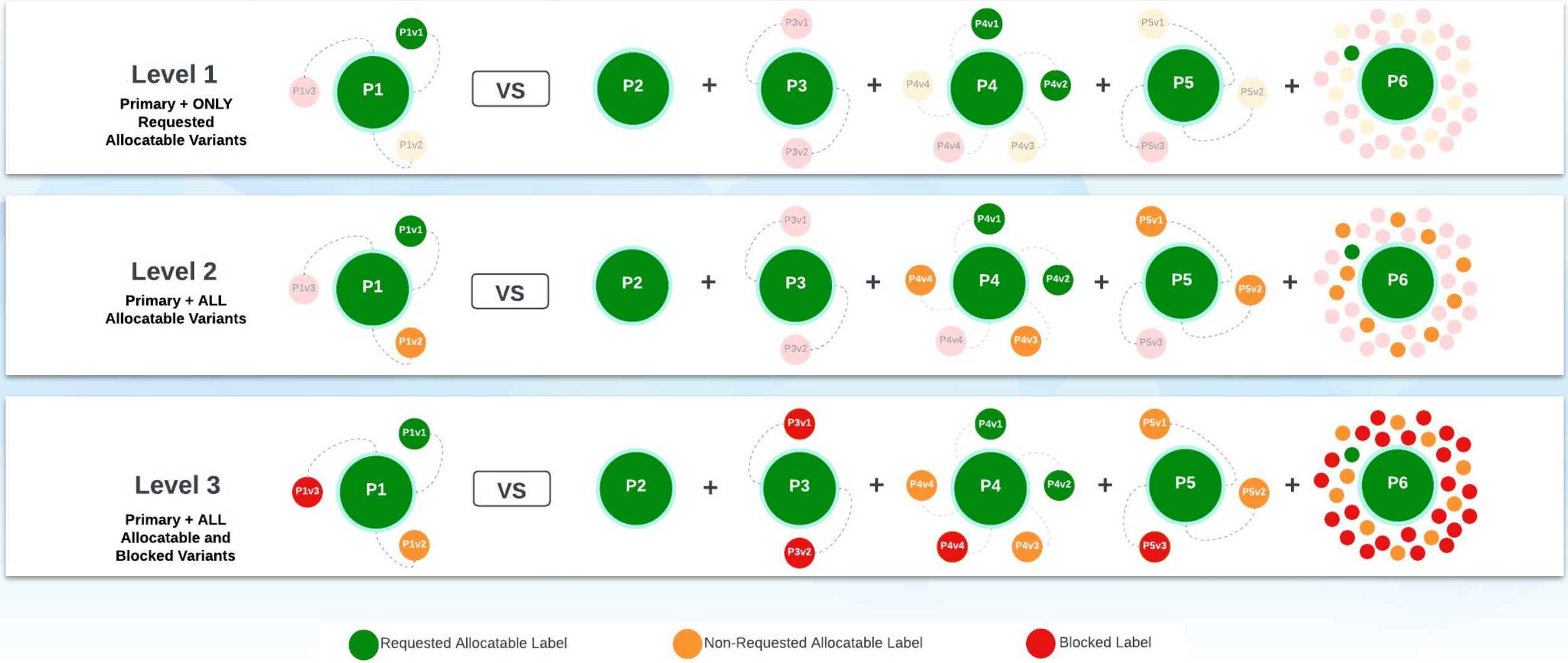
EPDP Team Discussion

The EPDP Team discussed three (3) possible levels of comparison among visually confusable strings, as well as analyzed the impact and potential consequences:

Level 1: Primary + only requested allocatable variants
Level 2: Primary + all allocatable variants
Level 3: Source gTLD + all valid variants (blocked + allocatable)

**Primary*: The applied-for gTLD that serves as the source string for calculating its allocatable and blocked variants during the application process; the applicant may request to activate none, one, or more allocatable variants of such an applied-for gTLD.*

Three Levels of Comparison



Problem Statement

String Similarity Small Group has been set up to tackle the following problems:

***Problem 1**: There is a divergence of opinions regarding which level is the most appropriate*

***Problem 2**: The discussion has been largely academic based on abstract concepts*

Small Group Tasks

Facilitate a comprehensible discussion by ***developing concrete examples of variants that are visually confusable***

Task 1: Develop ***concrete examples of strings*** that have blocked and/or allocatable variant labels and may be visually confusable with other strings in the same scripts or across scripts

- Develop practical examples – limit to visual similarity – that could happen in reality & indicate how feasible/possible such cases could happen
- Discuss whether any existing mechanisms that could help prevent such confusingly similar strings being delegated

Task 2: Demonstrate ***how these examples would be compared against each other in the string similarity review according to the three levels***, showcasing the impact on the review and the potential consequences

- Propose a String Similarity Review model with the view of minimizing security, stability, and user confusability risks

Task 3: Demonstrate ***how these examples would undergo the objection process according to the three levels***, showcasing the impact on the objection process and the potential consequences

- Identify which type of variants should be subject to the objection process

Exclusion: Complexity in implementation for Tasks 2 and 3 is out of scope – defer deliberation to EPDP Team

Small Group Composition

Member	Affiliation	Language Proficiency
Edmon Chung	Board Liaison	Chinese (Mandarin, Cantonese)
Hadia El miniawi	ALAC	Arabic
Imran Hossen	Independent	Bangla
Jerry Sen	RySG	Chinese (Mandarin)
Justine Chew (Small Group Lead)	ALAC	Malay
Michael Bauland	RrSG	German
Wael Nasr	Independent	Arabic

Note:

- Between 18 May 2022 and 10 August 2022, the Small Group held a total of 11 meetings
- Small Group agreed to the 3 tasks stated in the assignment form during its first meeting on 18 May 2022
- Supported by ICANN staff with additional language proficiency
- Wael Nasr joined toward the end of small group deliberation

Task 1

Develop concrete examples of strings that have blocked and/or allocatable variant labels and may be visually confusable with other strings in the same scripts or across scripts

Example Strings

The group developed **eight (8) examples**, as contributed by both members and staff, and discussed their **primary**, **allocatable** and, **blocked** variants calculated by RZ-LGR

No.	Label A	Label B	Label C	Practicality Consideration
1	Latin **bıß**	Cyrillic **вiss**		Valid strings per RZ-LGR
2	Traditional Chinese **滙豐**	Simplified Chinese **汇丰**		Real Chinese words with same meanings and variant relationship
3	Arabic **بنئ**	Arabic **بنى**		Valid strings per RZ-LGR with at least one string that's meaningful in a language
4	Simplified Chinese **华鸟**	Traditional Chinese **华島**		Real Chinese words with different meanings
5	Latin **rıch**	Latin **ṅch**		Valid strings per RZ-LGR
6	Arabic **ركى**	Arabic **رگے**		Valid strings per RZ-LGR with at least one string that's meaningful in a language
7	Simplified Chinese **华为**	Simplified Chinese **华鸟**	Simplified Chinese **华岛**	Real Chinese words with different meanings
8	Japanese Kanji **一休**	Traditional Chinese **一體**		Real Japanese and Chinese words with different meanings

Task 2

Demonstrate how these examples would be compared against each other in the string similarity review according to the three levels, showcasing the impact on the review and the potential consequences

Selected Examples for Comparison

No.	Label A	Label B	Label C
1	Latin **bıß**	Cyrillic **вiss**	
2	Traditional Chinese **滙豐**	Simplified Chinese **汇丰**	
3	Arabic **بنیٰ**	Arabic **بنى**	
4	Simplified Chinese **华鸟**	Traditional Chinese **华島**	
5	Latin **rıch**	Latin **ṅch**	
6	**Arabic ركى**	**Arabic ركے**	
7	**Simplified Chinese 华为**	**Simplified Chinese 华鸟**	**Simplified Chinese 华岛**
8	Japanese Kanji **一休**	Traditional Chinese **一體**	

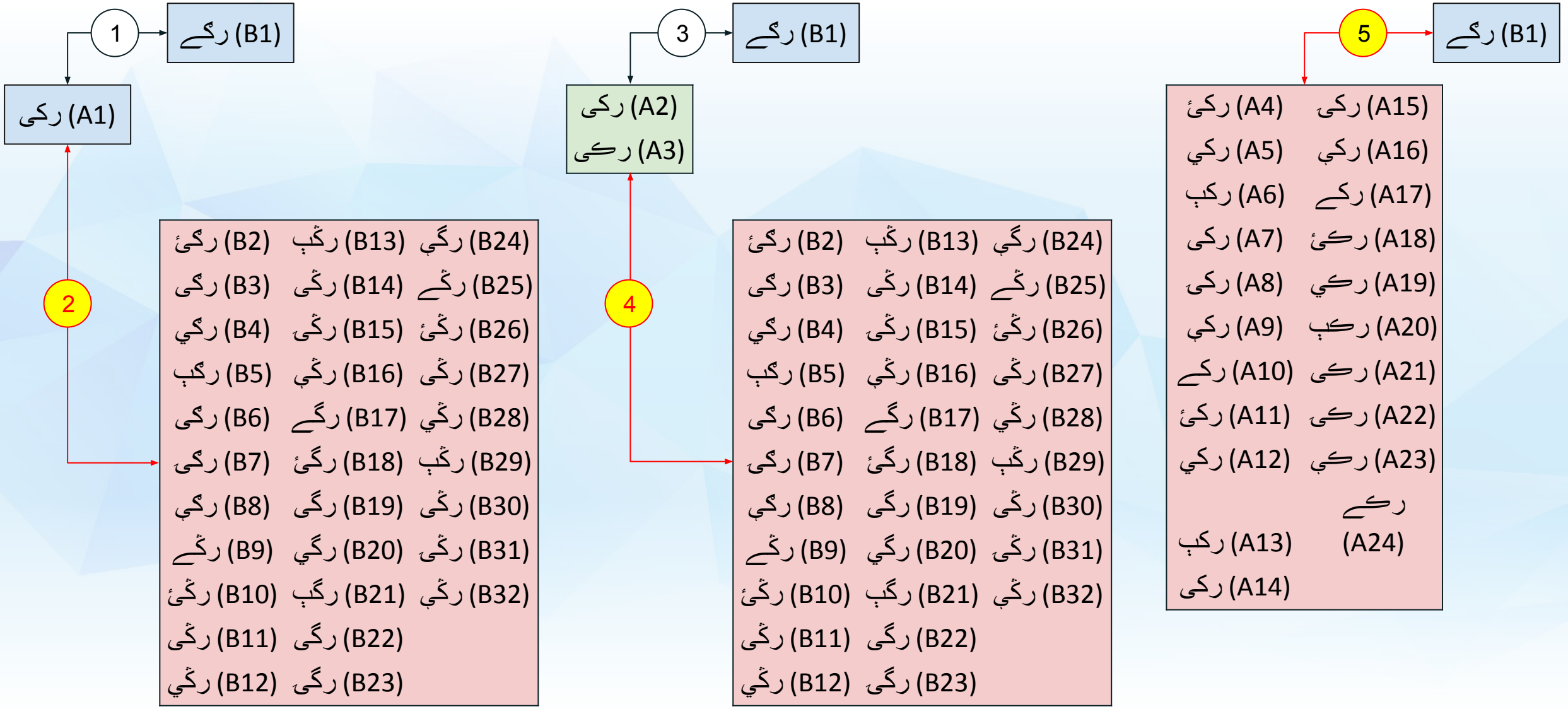
Demonstrate why hybrid model is recommended

Demonstrate
- Applied-for gTLD vs. Existing gTLD
- Comparison among three strings

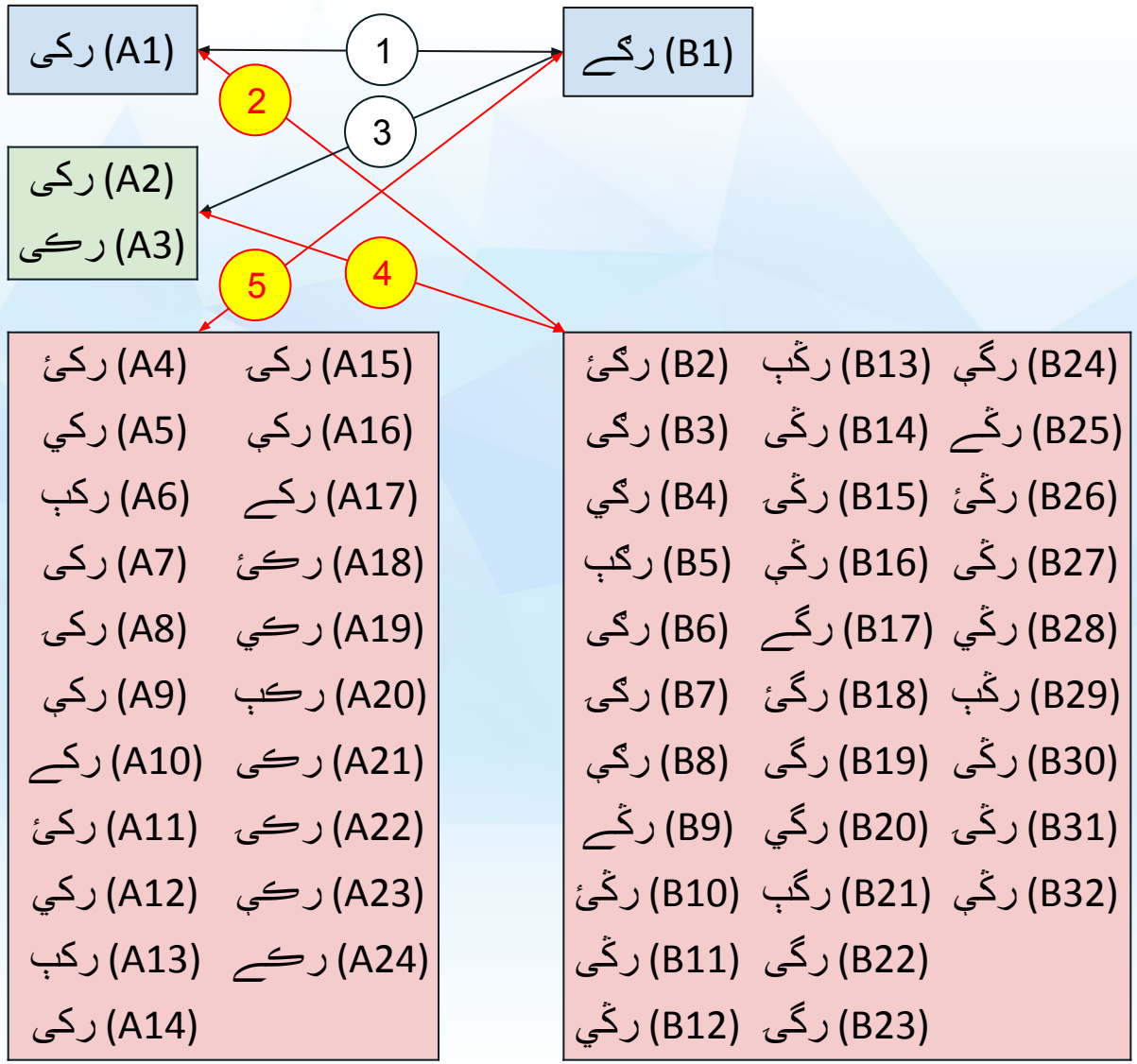
Example 6: Two Applied-for Arabic TLDs

Applied-for Primary Strings:	ركى (A1)	رگے (B1)
Allocatable Variants of Primary Strings:	ركى (A2) رکی (A3)	None
Blocked Variants of Primary Strings:	ركئ (A4) ركى (A15) ركي (A5) ركې (A16) ركپ (A6) ركے (A17) ركى (A7) ركئ (A18) ركى (A8) ركي (A19) ركې (A9) ركپ (A20) ركے (A10) ركى (A21) ركئ (A11) ركى (A22) ركي (A12) ركې (A23) ركپ (A13) ركے (A24) ركى (A14)	رگئ (B2) رگپ (B13) رگې (B24) رگى (B3) رگٹى (B14) رگٹے (B25) رگي (B4) رگٹى (B15) رگٹئ (B26) رگپ (B5) رگٹې (B16) رگٹى (B27) رگى (B6) رگے (B17) رگٹي (B28) رگى (B7) رگئ (B18) رگٹپ (B29) رگې (B8) رگى (B19) رگٹى (B30) رگٹے (B9) رگي (B20) رگٹى (B31) رگٹئ (B10) رگپ (B21) رگٹې (B32) رگٹى (B11) رگى (B22) رگٹي (B12) رگى (B23)

Example 6: String Similarity Review



Example 6: String Similarity Review (Cont.)



String Similarity Review may find the following confusingly similar strings

2 ركى (A1) & گى (B3) & گى (B6)

4 ركى (A2) & گى (B3) & گى (B6)

4 ركے (A3) & گى (B3) & گى (B6)

5 ركے (B1) & ركے (A10) & ركے (A17) & ركے (A24)

Potential Outcome of the String Similarity Review

ركى (A1) & its variants A2-A24 AND ركے (B1) & its variants B2-B32 get processed in a contention set

If the hybrid model were not used and blocked variants were not taken into account in String Similarity Review

ركى (A1) and ركے (B1) would have been both delegated with the misconnection risk. E.g., a user may mistake ركى (A1) as گى (B3), a blocked variant of ركے (B1), but arrive at site controlled by a registrant different to ركے (B1).

Example 7: Three Chinese TLDs

- Switch to PDF
  - scenario 1 - existing vs. applied-for
  - scenario 2 - three strings

Recommendation: Hybrid Model

Summary: *The small group recommends the* ***hybrid model****, which is a* ***mixed-level approach between level 2 and level 3***

Goal: *Mitigate any possibility of confusing similarity between one IDN TLD and another IDN TLD or any of its valid variant(s), vice versa*

In practice, the string similarity review must be modified to compare:

- **An applied-for primary IDN gTLD and <u>all of its allocatable variant label(s)</u>**

Against:

- **Existing TLDs and <u>all of their allocatable and blocked variant labels</u>;**
- **Strings requested as IDN ccTLDs and <u>all of their allocatable and blocked variant labels</u>;**
- **Other applied-for gTLDs in the same round and <u>all of their allocatable and blocked variant labels</u>;**
- **Reserved Names; and**
- **Any other two-character ASCII strings and <u>all of their allocatable and blocked variant labels</u> (*if the applied-for primary IDN gTLD is a two-character string*)**

In addition, compare:

- **<u>All of the blocked variant label(s)</u> of an applied-for primary IDN gTLD**

Against:

- **Existing TLDs and <u>all of their allocatable variant labels</u>**

Note: *Blocked variants of one IDN TLD should NOT be compared against blocked variants of another IDN TLD*

Rationale for Hybrid Model

Considering the limited scope of security, stability and user confusability, the small group believes the hybrid model would:

- **Be sufficiently conservative** and can **help mitigate two types of failure modes** – denial of service and misconnection, which may have a higher likelihood to affect non-native speakers of certain scripts or languages
- **Help detect many more pairs of visually confusable strings** and **reduce the risks of failure modes**
- **Reduce computational complexity by not requiring comparison of blocked variant labels** of a primary applied-for IDN gTLD string against blocked variant labels of other existing and applied-for TLD strings

The small group also believes that:

- Level 1 and 2 may fail to detect some visually confusable strings and increase the risks of failure modes
- Level 3 unnecessarily compares blocked variants against each other with exponential increase of computational complexity

Additional Considerations

- While the pool of strings that needs to be considered will be large, **language experts in the String Similarity Review panel can evaluate the strings on a case-by-case basis**
- After the evaluation completes, there are **other mechanisms in the New gTLD Program** – e.g., limited appeal mechanism and objection processes – to review the string similarity panel's decision

Task 3

Demonstrate how these examples would undergo the objection process according to the three levels, showcasing the impact on the objection process and the potential consequences

Discussion

Considering the Small Group preliminary recommendation on string similarity review and the roles the non-requested allocatable variants and blocked variants play…

In each type of the objection process:

String Confusion | **Limited Public Interest** | **Legal Rights** | **Community**

Which type of strings / labels must be taken into account?

- Primary applied-for string
- Requested allocatable variant
- Non-requested allocatable variant
- Blocked variant

General Assumptions for Objection Process Discussion

1. Concerning the objection process during the application round **when a primary gTLD string is being applied**, AND none, one, or more of its allocatable variant label(s) are being requested
2. Objection may be against:
    a. only the primary applied-for gTLD, OR
    b. one or more of the requested allocatable variant(s), OR
    c. combination of the primary applied-for gTLD and one or more requested allocatable variant(s)
3. Objection may or may NOT affect the entire application, depending on the objection process type

String Confusion Objection: Background

Overview: The applied-for gTLD string is confusingly similar to an existing TLD or to another applied-for gTLD string in the same round of applications

Standing: Existing TLD operators or gTLD applicants in the same round

Considerations:

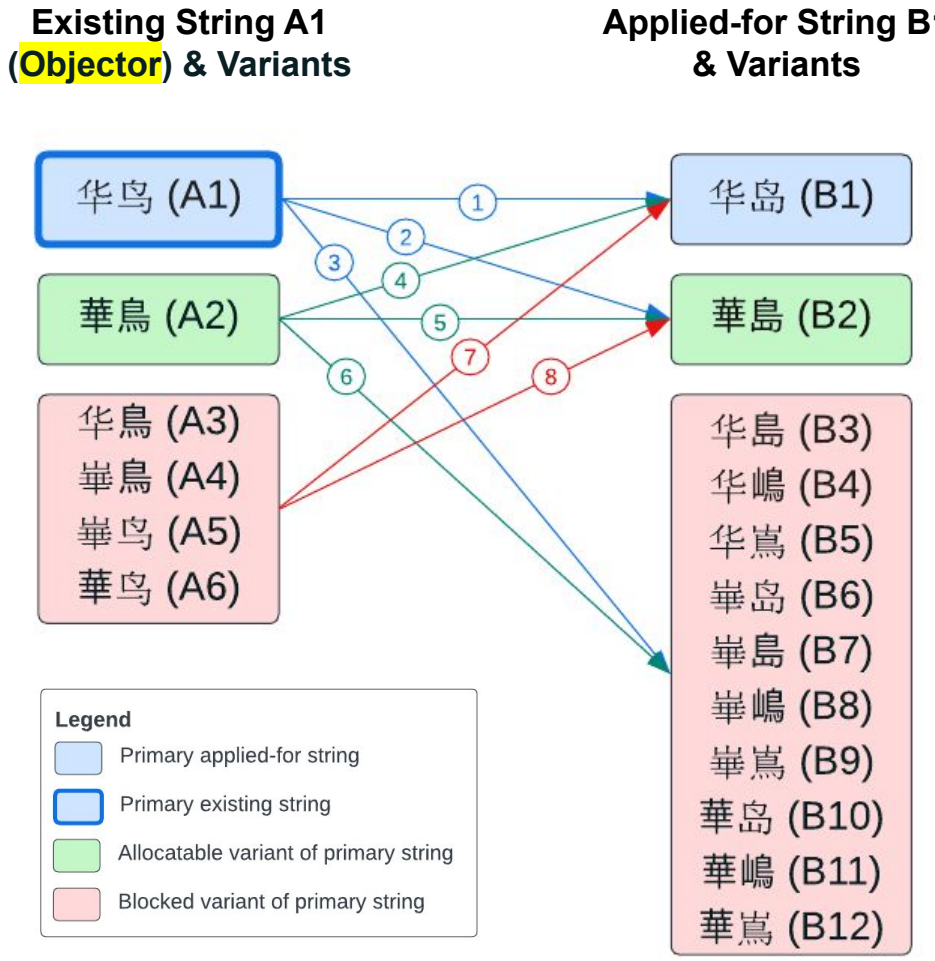
- A dispute resolution service provider (DRSP) panel will consider whether the applied-for gTLD string is likely to result in string confusion.
- An application that passes the String Similarity review is still subject to the String Confusion Objection.
- Such category of objection is not limited to visual similarity. Rather, confusion based on any type of similarity (including visual, aural, or similarity of meaning) may be claimed by an objector.

Potential Outcome:

- Existing TLD (Objector) vs. Applied-for gTLD
  - If objection prevails, applicant withdraws
  - If objection does NOT prevail, application proceeds to subsequent stage of new gTLD application process
- Applied-for gTLD (Objector) vs. Applied-for gTLD
  - If objection prevails, both applications be placed in a contention set and referred to a contention resolution procedure
  - If objection does NOT prevail, both applications proceed to subsequent stage of new gTLD application process

Limited Appeal Mechanism (SubPro): If an appeal is filed against the panel's decision, the outcome of the appeal will determine whether the application can proceed or not

String Confusion Objection: Questions for Consideration



Questions:

Can the existing TLD A1 operator submit a **String Confusion** objection against B1 by arguing that:

1. B1 is confusingly similar to A1?

2a. B2 [if requested for activation] is confusingly similar to A1?

2b. B2 [if NOT requested for activation] is confusingly similar to A1?

3. Any of B1's blocked variant {B3, B4…B12} is confusingly similar to A1?

4. B1 is confusingly similar to A2?

5a. B2 [if requested for activation] is confusingly similar to A2?

5b. B2 [if NOT requested for activation] is confusingly similar to A2?

6. Any of B1's blocked variant {B3, B4…B12} is confusingly similar to A2?

7. B1 is confusingly similar to any of A1's blocked variant {A3…A6}?

8a. B2 [if requested for activation] is confusingly similar to any of A1's blocked variant {A3…A6} ?

8b. B2 [if NOT requested for activation] is confusingly similar to any of A1's blocked variant {A3…A6}?

String Confusion Objection: Recommendation

Presumptions:

1. String Confusion objection aims to mitigate the misconnection risks; it warrants the same hybrid approach as the string similarity review
2. The primary applied-for string and all of its allocatable and blocked variants MUST be taken into account in the String Confusion objection
3. The outcome of String Confusion objection will affect the entire application

String Confusion objection CAN be filed based on the following ground:

1. **Primary applied-for string** is confusingly similar to the **primary string** of an existing TLD or another applied-for gTLD
2. **Primary applied-for string** is confusingly similar to **an allocatable variant** of an existing TLD or another applied-for gTLD
3. **Primary applied-for string** is confusingly similar to **a blocked variant** of an existing TLD or another applied-for gTLD
4. **An allocatable variant** of the primary applied-for string is confusingly similar to the **primary string** of an existing TLD or another applied-for gTLD
5. **An allocatable variant** of the primary applied-for string is confusingly similar to **an allocatable variant** of an existing TLD or another applied-for gTLD
6. **An allocatable variant** of the primary applied-for string is confusingly similar to **a blocked variant** of an existing TLD or another applied-for gTLD
7. **A blocked variant** of the primary applied-for string is confusingly similar to the **primary string** of an existing TLD or another applied-for gTLD
8. **A blocked variant** of the primary applied-for string is confusingly similar to **an allocatable variant** of an existing TLD or another applied-for gTLD

Limited Public Interest Objection: Background

Overview: Applied-for string contradicts generally accepted legal norms of morality and public order recognized under principles of international law, such as:

- The Universal Declaration of Human Rights
- Declaration on the Elimination of Violence against Women
- The International Covenant on Economic, Social and Cultural Rights

Standing: Anyone; Independent Objector

Considerations: An expert panel will conduct its analysis on the basis of the applied-for gTLD string itself. The panel may, if needed, use as additional context the intended purpose of the TLD as stated in the application

Potential Outcome:

- If objection prevails, applicant withdraws
- If objection does NOT prevail, application proceeds to subsequent stage of new gTLD application process

Limited Appeal Mechanism (SubPro): If an appeal is filed against the panel's decision, the outcome of the appeal will determine whether the application can proceed or not

Limited Public Interest Objection: Questions for Consideration

Applied-for String B1 & Variants

Questions:

Can someone submit a **Limited Public Interest** objection against B1 by arguing that:

1. B1 is contrary to general principles of international law for morality and public order?
2. B2 [if requested for activation] is contrary to general principles of international law for morality and public order?
3. B2 [if NOT requested for activation] is contrary to general principles of international law for morality and public order?
4. Any of B1's blocked variant {B3, B4, B5…B12} is contrary to general principles of international law for morality and public order?

Limited Public Interest: Recommendation

Presumptions:

1. Unlike the String Confusion objection, Limited Public Interest objection is not intended to prevent failure mode, but to prevent delegation of strings that contradict legal norms of morality and public order recognized under principles of international law
2. The outcome of Limited Public Interest objection may NOT affect the entire application
   (a) If the LPI objection against only the primary applied-for gTLD prevails, the entire application is ineligible to proceed
   (b) If the LPI objection against requested variant(s) prevails, **the affected variant(s) are ineligible to proceed but the primary applied-for gTLD and non-affected requested variants proceed to the next stage**
   (c) If the LPI objection filed against the combination of the primary applied-for gTLD and requested allocatable variant(s) prevail, the entire application is ineligible to proceed

Limited Public Interest objection CAN be filed against:

1. **Primary applied-for string**
2. **Requested allocatable variants**

Limited Public Interest objection SHOULD NOT be filed against:

1. **Non-requested allocatable variants** (*Rationale: objectors will be active to file a LPI objection when a variant is actively being requested*)
   a. However, IF variants are allowed to be activated between rounds, objection **CAN** also be filed against **non-requested allocatable variants** in the same round as the primary string (*Rationale:* all checks should be done upfront as a pre-screening step)
2. **Blocked variants** (*Rationale*: blocked will never be delegated in the root zone)

Legal Rights Objection: Background

Overview: The applied-for string infringes the existing legal rights of the objector

Standing: Rightsholder (including eligible intergovernmental organization)

Considerations:

- A DRSP panel will determine whether the potential use of the applied-for gTLD:
  - Takes unfair advantage of the distinctive character or the reputation of the objector's mark, or
  - Unjustifiably impairs the distinctive character or the reputation of the objector's mark, or
  - Creates an impermissible likelihood of confusion between the applied-for gTLD and the objector's mark
- Possible non-exclusive factors include:
  - The applied-for gTLD is identical or similar, including in appearance, phonetic sound, or meaning, to the objector's existing mark;
  - The applicant's intended use of the gTLD would create a likelihood of confusion with the objector's mark as to the source, sponsorship, affiliation, or endorsement of the gTLD; etc.

Potential Outcome:

- If objection prevails, applicant withdraws
- If objection does NOT prevail, application proceeds to subsequent stage of new gTLD application process

Limited Appeal Mechanism (SubPro): If an appeal is filed against the panel's decision, the outcome of the appeal will determine whether the application can proceed or not

Legal Rights Objection: Questions for Consideration

Applied-for String B1 & Variants

Questions:

Can a rightsholder submit a **Legal Rights** objection against B1 by arguing that:

1. B1 infringes the existing legal rights of the rightsholder?
2. B2 [if requested for activation] infringes the existing legal rights of the rightsholder?
3. B2 [if NOT requested for activation] infringes the existing legal rights of the rightsholder?
4. Any of B1's blocked variant {B3, B4, B5…B12} infringes the existing legal rights of the rightsholder?

Legal Rights Objection: Recommendation (Option 1)

Presumptions:

1. Unlike the String Confusion objection, Legal Rights objection is not intended to prevent failure mode, but to prevent delegation of strings that infringe the existing legal rights of the rightsholder
2. The outcome of Legal Rights objection may NOT affect the entire application

Legal Rights objection CAN be filed against:

1. **Primary applied-for string**
2. **Requested allocatable variants**

Legal Rights objection SHOULD NOT be filed against:

1. **Non-requested allocatable variants** (*Rationale: objectors will be active to file an objection when a variant is actively being requested*)
    a. However, IF variants are allowed to be activated between rounds, Legal Rights objection **CAN** also be filed against **non-requested allocatable variants** in the same round as the primary string (*Rationale:* all checks should be done upfront as a pre-screening step)
2. **Blocked variants** (*Rationale*: blocked will never be delegated in the root zone)

Legal Rights Objection: Recommendation (Option 2)

Legal Rights objection CAN be filed against:

1. **Primary applied-for string**
2. **ALL allocatable variants**
3. **ALL blocked variants**

Additional Rationale:

1. This will help prevent the event where a delegated string may block the chance for a rightsholder to apply for another string that is the same or similar to any valid variant of the already delegated string
2. If the objection is filed against a non-requested allocatable or a blocked variant, **it needs to meet a higher bar to prevail** (e.g., the objector needs to demonstrate how an unapplied-for/undelegated string will infringe the existing legal rights of the rightsholder)

Legal Rights Objection: Recommendation (Option 2) - Additional Rationale

华鸟 (A1)

華鳥 (A2)

華鳥 (A3)
嶌鳥 (A4)
嶌鸟 (A5)
華鸟 (A6)

- A1 is a trademark and the only applied-for string in New gTLD Application **Round 1**
- <u>If Legal Rights objection recommendation option 1 is adopted</u>:
  - Objection can only be filed against A1
  - Objection cannot be filed against non-requested allocatable variant A2 and blocked variants A3-A6
- A1 passed evaluation and got delegated to the rootzone

華島 (B2)

- B2 is another trademark
- Rightsholder of B2, who did not submit an application during Round 1, would like to apply for a string in **Round 2**
- <u>If Legal Rights objection recommendation option 1 is adopted</u>, B2 may not pass the string similarity review in Round 2, because it is confusingly similar to A2 and A4, variants of the already delegated A1
- <u>If Legal Rights objection recommendation option 2 is adopted</u>:
  - Rightsholder of B2 CAN object to A1 by arguing that its variants A2 and A4 are similar to the existing mark B2
  - If objection prevails, application for A1 may be ineligible to proceed in Round 1, and B2 may have a chance to be delegated in Round 2

Community Objection: Background

Overview: Substantial opposition to the applied-for string exists from a significant portion of the community that the gTLD targets

Standing: Established institutions associated with a clearly defined community; Independent Objector

Considerations: The objector must prove that:

- The community invoked by the objector is a clearly delineated community; and
- Community opposition to the application is substantial; and
- There is a strong association between the community invoked and the applied-for gTLD string; and
- The application creates a likelihood of material detriment to the rights or legitimate interests of a significant portion of the community to which the string may be explicitly or implicitly targeted.

Potential Outcome:

- If objection prevails, applicant withdraws
- If objection does NOT prevail, application proceeds to subsequent stage of new gTLD application process

Limited Appeal Mechanism (SubPro): If an appeal is filed against the panel's decision, the outcome of the appeal will determine whether the application can proceed or not

Community Objection: Questions for Discussion

Applied-for String B1 & Variants

Questions:

Can an established institution submit a **Community** objection against B1 by arguing that:

1. B1 has a substantial opposition from a significant portion of that community?
2. B2 [if requested for activation] has a substantial opposition from a significant portion of that community?
3. B2 [if NOT requested for activation] has a substantial opposition from a significant portion of that community?
4. Any of B1's blocked variant {B3, B4, B5…B12} has a substantial opposition from a significant portion of that community?

Community Objection: Recommendation (Option 1)

Presumptions:

1. Unlike the String Confusion objection, Community objection is not intended to prevent failure mode, but to prevent delegation of strings that have substantial opposition from a significant portion of the community the gTLD targets
2. The outcome of Community objection may NOT affect the entire application

Community objection CAN be filed against:

1. **Primary applied-for string**
2. **Requested allocatable variants**

Community objection SHOULD NOT be filed against:

1. **Non-requested allocatable variants** (*Rationale: objectors will be active to file an objection when a variant is actively being requested*)
    a. However, IF variants are allowed to be activated between rounds, Community objection **CAN** also be filed against **non-requested allocatable variants** in the same round as the primary string (*Rationale:* all checks should be done upfront as a pre-screening step)
3. **Blocked variants** (*Rationale*: blocked will never be delegated in the root zone)

Community Objection: Recommendation (Option 2)

Community objection CAN be filed against:

1. **Primary applied-for string**
2. **ALL allocatable variants**
3. **ALL blocked variants**

Additional Rationale:

1. This will help prevent the event where a delegated string may block the chance for a community to apply for another string that is the same or similar to any valid variant of the already delegated string
2. If the objection is filed against a non-requested allocatable or a blocked variant, **it needs to meet a higher bar to prevail** (e.g., the objector needs to demonstrate how an unapplied-for/undelegated string will encounter substantial opposition from the community)

Community Objection: Recommendation (Option 2) - Additional Rationale

华鸟 (A1)

華鳥 (A2)

華鳥 (A3)
崋鳥 (A4)
崋鸟 (A5)
華鸟 (A6)

- A1 is the only applied-for string in New gTLD Application **Round 1**
- <u>If Community objection recommendation option 1 is adopted</u>:
  - Objection can only be filed against A1
  - Objection cannot be filed against non-requested allocatable variant A2 and blocked variants A3-A6
- A1 passed evaluation and got delegated to the rootzone

華島 (B2)

- A community, who did not submit an application during Round 1, would like to apply for B2 in **Round 2** as a community TLD
- <u>If Community objection recommendation option 1 is adopted</u>, B2 may not pass the string similarity review in Round 2, because it is confusingly similar to A2 and A4, variants of the already delegated A1
- <u>If Community objection recommendation option 2 is adopted</u>:
  - The community CAN object to A1 by arguing that its variants A2 and A4 are similar to B2 and have substantial opposition from the community
  - If objection prevails, application for A1 may be ineligible to proceed in Round 1, and B2 may have a chance to be delegated in Round 2

Conclusion

String Similarity Review Recommendation

Summary: *The small group recommends the* ***hybrid model****, a* ***mixed-level approach between level 2 and level 3***

The string similarity review must be modified to compare:

- **An applied-for primary IDN gTLD and all of its allocatable variant label(s)**

Against:

- **Existing TLDs and all of their allocatable and blocked variant labels;**
- **Strings requested as IDN ccTLDs and all of their allocatable and blocked variant labels;**
- **Other applied-for gTLDs in the same round and all of their allocatable and blocked variant labels;**
- **Reserved Names; and**
- **Any other two-character ASCII strings and all of their allocatable and blocked variant labels (*if the applied-for primary IDN gTLD is a two-character string*)**

In addition, the string similarity review must be modified to compare:

- **All of the blocked variant label(s) of an applied-for primary IDN gTLD**

Against:

- **Existing TLDs and all of their allocatable variant labels**

String Confusion Objection Recommendation

String Confusion objection CAN be filed based on the following ground:

1. **Primary applied-for string** is confusingly similar to the **primary string** of an existing TLD or another applied-for gTLD
2. **Primary applied-for string** is confusingly similar to **an allocatable variant** of an existing TLD or another applied-for gTLD
3. **Primary applied-for string** is confusingly similar to **a blocked variant** of an existing TLD or another applied-for gTLD
4. **An allocatable variant** of the primary applied-for string is confusingly similar to the **primary string** of an existing TLD or another applied-for gTLD
5. **An allocatable variant** of the primary applied-for string is confusingly similar to **an allocatable variant** of an existing TLD or another applied-for gTLD
6. **An allocatable variant** of the primary applied-for string is confusingly similar to **a blocked variant** of an existing TLD or another applied-for gTLD
7. **A blocked variant** of the primary applied-for string is confusingly similar to the **primary string** of an existing TLD or another applied-for gTLD
8. **A blocked variant** of the primary applied-for string is confusingly similar to **an allocatable variant** of an existing TLD or another applied-for gTLD

Limited Public Interest Objection Recommendation

Limited Public Interest objection CAN be filed against:

1. **Primary applied-for string**
2. **Requested allocatable variants**

Limited Public Interest objection SHOULD NOT be filed against:

1. **Non-requested allocatable variants**
    a. However, IF variants are allowed to be activated between rounds, objection **CAN** also be filed against **non-requested allocatable variants** in the same round as the primary string
2. **Blocked variants**

Legal Rights Objection Recommendation

OPTION 1

Legal Rights objection CAN be filed against:

1. **Primary applied-for string**
2. **Requested allocatable variants**

Legal Rights objection SHOULD NOT be filed against:

1. **Non-requested allocatable variants**
    a. However, IF variants are allowed to be activated between rounds, objection **CAN** also be filed against **non-requested allocatable variants** in the same round as the primary string
2. **Blocked variants**

OPTION 2

Legal Rights objection CAN be filed against:

1. **Primary applied-for string**
2. **ALL allocatable variants**
3. **ALL blocked variants**

Community Objection Recommendation

OPTION 1

Community objection CAN be filed against:

1. **Primary applied-for string**
2. **Requested allocatable variants**

Community objection SHOULD NOT be filed against:

1. **Non-requested allocatable variants**
   a. However, IF variants are allowed to be activated between rounds, objection **CAN** also be filed against **non-requested allocatable variants** in the same round as the primary string
2. **Blocked variants**

OPTION 2

Community objection CAN be filed against:

1. **Primary applied-for string**
2. **ALL allocatable variants**
3. **ALL blocked variants**

Comments?