# Process and methodology for confusing similarity evaluation
Version 01- 04 July 2022

The ccNSO proposed a two-step confusing similarity review in 2013. However over time the Fast Track process evolved further. The IDN Fast Track Process was updated in 2013, following completion of the ccPDP2, to include of the Extended Process Similarity Review Panel. In 2019 the Fast Track was again updated to include of the Risk Mitigation Measures Evaluation. This change was the result of the third review of the Fast Track Process.

For reference are included:
1. Relevant Sections 2013 ccPDP2 Proposed Policy (page 2-6)
2. Relevant sections of the Fast Track Process (page 7- 13)
3. Links to relevant Guidelines to EPSRP and Risk Mitigation Measures Evaluation Process. These Guidelines provide detailed procedural aspect and additional clarifications of methodology, panels etc. (page 14)
4. Reference to joint ccNSO SSAC Response to ICANN Board (on introduction of Risk Mitigation) (page 14)

**Basic questions to initiate discussion about the evaluation process**
What are pro and cons of each of the 3 steps of the Fast Track Confusing Similarity Review?
Which issue(s) are addressed by each step?
To address this question, suggested to understand and be aware of the pro's and con's of each step and overall process.

Which of the processes need to be included in the proposed policy?
Under assumption that confusing similarity review will be required, should it include both an evaluation and opportunity to suggest risk mitigation?
See:
and has to be conducted by external, independent body(ies), should it be a:
- One (1) step process? Original Fast Track process
- Two (2) step process: CS evaluation and Risk Mitigation or CS evaluation and review of CS evaluation.
- Three (3) step process: as currently under the Fast Track Process

# 1. Relevant Section 2013 ccPDP2 Proposed Policy

**I. Confusing similarity of IDN ccTLD Strings.** A selected IDN ccTLD string should not be confusingly similar with:

1. Any combination of two ISO 646 Basic Version (ISO 646-BV) characters[1] (letter [a-z] codes), nor
2. Existing TLDs or Reserved Names as referenced in the new gTLD Applicant Guidebook[2]

The following supplemental rules provide the thresholds to solve any contention issues between the IDN ccTLD selection process and new gTLD process:

- A gTLD application that is approved by the ICANN Board will be considered an existing TLD unless it is withdrawn.

- A validated request for an IDN ccTLD will be considered an existing TLD unless it is withdrawn.

A selected IDN ccTLD string is considered confusingly similar with one or more other string(s) (which must be either Valid-U-labels or any a combination of two or more ISO 646 BV characters) if the appearance of the selected string in common fonts in small sizes at typical screen resolutions is sufficiently close to one or more other strings so that it is probable that a reasonable Internet user who is unfamiliar with the script would perceive the strings to be the same or confuse one for the other[3].

The review of whether or not a selected IDN ccTLD string is confusingly similar is a process step and should be conducted externally and independently. The recommended procedure is described in Section 2.1.3, Processes and Documentation.

The method and criteria to assess confusing similarity should be developed as part of the implementation planning. For reasons of transparency and accountability they should be made public prior to implementation of the overall policy and endorsed by the ccNSO.

The assessment of confusing similarity of strings depends on amongst other things linguistic, technical, and visual perception factors, therefore these elements should be taken into consideration in developing the method and criteria.
Taking into account the overarching principle to preserve and ensure the security, stability and interoperability of the DNS, the method and criteria for the confusing similarity assessment of an IDN ccTLD string should take into account and be guided by the Principles for Unicode Point Inclusion in labels in the DNS Root[4].

*Notes and Comments*

The rule on confusing similarity originates from the IDNC WG and Fast Track

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[1]    International Organization for Standardization, "Information Technology – ISO 7-bit coded character set for information interchange," ISO Standard 646, 1991

[2]    Version 2012-06-04, section 2.2.1.2.1 Reserved Names.

[3]    Based on Unicode Technical Report #36, Section 2: Visual Security Issues

[4]    https://datatracker.ietf.org/doc/draft-iab-dns-zone-codepoint-pples/

Implementation Plan and was introduced to minimize the risk of confusion with existing or future two letter country codes in ISO 3166-1 and other TLDs. This is particularly relevant as the ISO 3166 country codes are used for a broad range of applications, for example but not limited to, marking of freight containers, postal use and as a basis for standard currency codes.

The risk of string confusion is not a technical DNS issue, but can have an adverse impact on the security and stability of the domain name system, and as such should be minimized and mitigated.

The method and criteria used for the assessment cannot be determined only on the basis of a linguistic and/or technical method of the string and its component parts, but also needs to take into account and reflect the results of scientific research relating to confusing similarity, for example from cognitive neuropsychology[5].

**Stage 2: Validation of IDN ccTLD string**

*1. General description*
The String Validation stage is a set of procedures to ensure all criteria and requirements regarding the selected IDN ccTLD string (as listed in Section 3 of the Report) have been met. Typically this would involve:
- The IDN ccTLD string requester. This actor initiates the next step of this stage of the process by submitting a request for adoption and associated documentation.
- ICANN staff. ICANN staff will process the submission and coordinate between the different actors involved.
- Independent Panels to review the string (Technical and Similarity Panels).

The activities during this stage would typically involve:
1. Submission of IDN table.
2. Submission of selected string and related documentation.
3. Validation of selected IDN ccTLD string:
   a. ICANN staff validation of request. This includes
      i. Completeness of request
      ii. Completeness and adequacy of Meaningfulness and Designated Language documentation
      iii. Completeness and adequacy of support from relevant public authority
      iv. Completeness and adequacy of support from other Significantly Interested Parties

   b. Independent Reviews.
      i. Technical review
      ii. String Confusion review
4. Publication of selected IDN ccTLD string on ICANN website

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[5]    See for example, M. Finkbeiner and M. Coltheart (eds), Letter Recognition: from Perception to Representation. Special Issue of the Journal *Cognitive Neuropsychology*, 2009

*b. Independent Reviews*

**General description of Technical and string confusion review**

It is recommended that ICANN appoint the following external and independent Panels:
- To validate the technical requirements ICANN should appoint a "Technical Panel[6]" to conduct a technical review of the selected IDN ccTLD string.

- To validate a selected string is not confusingly similar, ICANN should appoint an external and independent " Similarity Review Panel" to review the selected IDN ccTLD string for confusing similarity.

- To allow for a final validation review relating the confusing similarity, and only if so requested by the requester, ICANN should appoint, an external and independent " Extended Process Similarity Review Panel."

As part of the implementation planning the details of the roles and responsibilities of the panels and its membership requirements should be developed in conjunction with the development of the methods and criteria for assessing the technical[7] and confusing similarity[8] validity of the selected IDN ccTLD strings and details of the reporting as foreseen for the validation processes.

**Process for Technical Validation**
1. After completion of the ICANN staff validation of the request, ICANN staff will submit the selected IDN ccTLD string to the "Technical Panel" for the technical review.
2. The Technical Panel conducts a technical string evaluation of the string submitted for evaluation. If needed, the Panel may ask questions for clarifications through ICANN staff.
3. The findings of the evaluation will be reported to ICANN staff. In its report the Panel shall include the names of the Panelists and document its findings, and the rationale for the decision.

Usually the Panel will conduct its review and send its report to ICANN staff within 30 days after receiving the IDN ccTLD string to be evaluated.  In the event the Panel expects it will need more time, ICANN staff will be informed. ICANN staff shall inform the requester accordingly.

4 If according to the technical review the string meets all the technical criteria the string is technically validated. If the selected string does not meet all the technical criteria the string is not-valid. ICANN staff shall inform and notify the requester accordingly.

**Process for confusing similarity validation**
1. After completion of the Technical Validation ICANN staff will submit the selected IDN ccTLD string to the String Similarity Panel for the confusing similarity string evaluation.

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[6]     Or any other name ICANN would prefer.
[7]     See section 2.1.2 H above
[8]     See 2.1.2 I above

2. The Panel shall conduct a confusability string evaluation of the string submitted for evaluation. The Panel may ask questions for clarification through ICANN staff.
3. The findings of the evaluation will be reported to ICANN staff. In the report the Panel will include the names of the Panelists, document the decision and provide the rationale for the decision. Where the string is considered to be confusingly similar the report shall at a minimum include a reference to the string(s) to which the confusing similarity relates and examples (in fonts) where the panel observed the similarity.

   ICANN staff shall inform and notify the requester accordingly.
   Usually the Panel will conduct its review and send its report to ICANN staff within 30 days after receiving the IDN ccTLD string to be evaluated. In the event the Panel expects it will need more time, ICANN staff will be informed. ICANN staff shall inform the requester accordingly.

**4 a.** If according to the review, the Panel does not consider the string to be confusingly similar, the selected IDN ccTLD is validated.

**4 b.** If according to the review the selected IDN ccTLD string presents a risk of string confusion with one particular combination of two ISO 646 Basic Version (ISO 646-BV) characters and this combination is according the ISO 3166 standard the two-letter alpha-2 code associated with same Territory as represented by the selected string, this should be noted in the report. ICANN staff shall inform the requester accordingly.

If, within 3 months of receiving the report the requestor shall confirm that:
> (i) The intended manager and intended registry operator for the IDN ccTLD and the ccTLD manager for the confusingly similar country code are one and the same entity; and
> (ii) The intended manager of the IDN ccTLD shall be the entity that requests the delegation of the IDN ccTLD string; and
> (iii) The requester, intended manager and registry operator and, if necessary, the relevant public authority, accept and document that the IDN ccTLD and the ccTLD with which it is confusingly similar will be and will remain operated by one and the same manager, and
> (iv) The requester, intended manager and registry operator and, if necessary, the relevant public authority agree to specific and pre-arranged other conditions with the goal to mitigate the risk of user confusion as of the moment the IDN ccTLD becomes operational;

then the IDN ccTLD string is deemed to be valid.
If either the requester, intended manager or the relevant public authority do not accept the pre-arranged conditions within 3 months after notification or at a later stage refutes the acceptance, the IDN ccTLD shall not be validated.
Alternatively, the requester may defer from this mechanism and use the procedure as described under 4 c.

**4c.**
i. If according to the review the selected IDN ccTLD string is found to present a risk of string confusion, ICANN staff shall inform the requester in accordance with paragraph 3 above.

The requester may call for an Extended Process Similarity Review and provide additional documentation and clarification referring to aspects in the report of the Panel. The requester should notify ICANN within three (3) calendar months after the date of notification by ICANN, and include the additional documentation.  After receiving the notification from the requester, ICANN staff shall call on the Extended Process Similarity Review Panel (EPSRP).

ii. The EPSRP conducts its evaluation of the string, based on the standard and methodology and criteria developed for it, and, taking into account, but not limited to, all the related documentation from the requester, including submitted additional documentation, IDN tables available, and the finding of the Similarity Review Panel. The EPSRP may ask questions for clarification through ICANN staff.

iii. The findings of the EPSRP shall be reported to ICANN staff and will be publicly announced on the ICANN website. This report shall include and document the findings of the EPSRP, including the rationale for the final decision, and in case of the risk of confusion a reference to the strings that are considered confusingly similar and examples where the panel observed this similarity.

If according to the Extended Process Similarity Review, the EPSRP does not consider the string to be confusingly similar the selected IDN ccTLD is valid.

### 3. Publication of IDN ccTLD string

After successful completion of the request validation procedure and the IDN ccTLD string is valid according to both technical and string similarity review procedures, ICANN shall publish the selected IDN ccTLD String publicly on its website.

## 2. Relevant Sections Fast Track Process

https://www.icann.org/en/system/files/files/idn-cctld-implementation-plan-28mar19-en.pdf

Section 4.1 String Evaluation

The role and responsibility of the DNS Stability Evaluation is to provide external and independent advice to the ICANN Board about whether a selected string meets the required technical criteria and is not confusingly similar to any combination of two ISO 646 Basic Version (ISO 646-BV) characters[3] (letter [a-z] codes or other existing or applied for TLDs. If according to the DNS Stability Evaluation the selected string does not meet one or more of the technical criteria or is considered confusingly similar to another string, the request for the IDN ccTLD with that particular selected string is not eligible under the Fast Track Process. The DNS Stability Evaluation includes the following evaluations:

- To evaluate a string for compliance with technical requirements, an external and independent "Technical Panel" conducts a technical review of the requested IDN ccTLD string.
- To evaluate a string for string similarity, an external and independent "Similarity Review Panel" conducts a review of the requested IDN ccTLD string.
- To evaluate a string for string similarity if found to be confusingly similar by the "Similarity Review Panel" and using a different framework, an external and independent "Extended Process Similarity Review Panel" (hereafter: EPSRP) conducts a review of the requested IDN ccTLD string, only if so requested by the requester.

The "Technical Panel" and "Similarity Review Panel" evaluations are currently combined under the function of the DNS Stability Panel.

The DNS Stability Panel will conduct the review of requested strings in the Fast Track Process for conformity with the TLD String Criteria. The Panel will also review requested strings for confusing similarity with existing TLDs, other TLDs requested in the IDN ccTLD Fast Track Process, and applied-for strings in the new gTLD Program.

If the DNS Stability Panel, in performance of its string similarity review function, deems the requested string as invalid, the EPSRP evaluation may be requested by the requester, to allow for a final string similarity review. The requester will have three months to notify ICANN of its request to invoke the EPSRP. If used, the EPSRP conducts a second and final evaluation of the string, based on the methodology and criteria defined for the panel in section 4.3, and may ask clarification questions through ICANN staff.

If the requester seeks review by the EPSRP within the appropriate timeframe, ICANN will request an external and independent review by the EPSRP. The EPSRP takes into account all the related documentation from the requester, including submitted additional documentation, IDN tables available, and the findings of the DNS Stability Panel.

The findings of the EPSRP are reported to ICANN staff and will be publicly announced on the ICANN website. If the EPSRP does not consider the string to be confusingly similar, the requested IDN ccTLD string is deemed valid for string similarity purposes.

The EPSRP includes, at a minimum, specialists from character recognition areas of study.

The DNS Stability evaluation process and procedures are described in more detail in Module 5, section 5.6.3

4.2 DNS Stability Panel Function

A core piece of the IDNC WG Final Report is technical recommendations to ensure stable and secure operations of the DNS. These technical requirements are outlined in Module 3. All requests in the Fast Track Process must successfully pass a DNS Stability Review for the requested IDN ccTLD string to continue through the Fast Track Process.

The DNS Stability Panel conducts an initial evaluation on all strings submitted in the Fast Track Process.

ICANN has contracted with Interisle Consulting Group (http://www.interisle.net/) to coordinate the DNS Stability Panel. This Panel consists of six experts, with the ability of the Panel to call upon linguistic expertise in consultation with ICANN.

Members of the DNS Stability Panel are experts in the design, management and implementation of complex systems and standard-protocols utilized in Internet infrastructure and DNS. Panel members have expertise in the technology and practical implementation and deployment of the DNS, and knowledge of Internationalized Domain Names and IDNA Protocol.

ICANN creates batches of strings received for the Fast Track Process on a monthly basis and submits the batches to the DNS Stability Panel for review.

If the Panel identifies that a requested string may raise significant security and stability issues, or is confusingly similar to an existing TLD or applied-for TLD, a three- member extended review team (RT) may be created to conduct a more detailed evaluation of the string. Such detailed review may be conducted when the entire Panel lacks sufficient expertise to determine whether the requested string raises significant security and stability issues, but this is expected to be a rare occurrence. The RT may decide the need for additional expertise and may select a new individual expert to take part in the extended review.

None of the RT members shall have an existing competitive, financial, or legal conflict of interest, and members shall be selected with due regard to the particular technical issue raised y the referral.

In the event that a need for linguistic expertise is identified, the Panel will consult with ICANN staff on linguistic resources.

Usually the Panel will conduct its review within 30 days and deliver a report to ICANN staff.

The Panel may seek clarification from the requester through ICANN staff if necessary. A more detailed review is likely not to be necessary for a string that fully complies with the string requirements referenced in Module 3. However, the string review process provides an additional safeguard if unanticipated security or stability issues arise concerning a requested IDN ccTLD string.

If the Panel determines that the requested string does not comply with relevant standards or creates a condition that may adversely affect the throughput, response time, consistency or coherence of responses to Internet servers or end systems, then the findings will be communicated to ICANN staff and from ICANN to the requester.

The request for an IDN ccTLD cannot proceed through the Fast Track Process if, as part of the technical review process, the Panel identifies that a requested string raises significant security and stability issues.

If, as a result of the string similarity review, the DNS Stability Panel deems the string to be invalid, the request cannot proceed through the Fast Track Process, unless the requester initiates the EPSRP evaluation within three months following ICANN's notification to the requester of the DNS Stability Panel's string similarity determination.

4.3 *Extended Process Similarity Review Panel Function*

The Extended Process Similarity Review Panel (EPSRP) can be called on to perform a second and final confusing similarity assessment of the requested IDN ccTLD string if: (1) The DNS Stability Panel, in performing its string similarity review, deems the string to be invalid; and (2) if the requester seeks review by the EPSRP within three months of ICANN's notification of the DNS Stability Panel's determination.

The EPSRP shall review the requested string(s) on the basis of the framework described in the 'Guidelines for the Extended Process Similarity Review Panel', with a clear focus on the overarching principle to preserve and ensure the security, stability and interoperability of the DNS.

This methodology represents a significantly different approach for the confusing similarity evaluation and is likely to be more time consuming than the first review and to require additional resources. As such, it will only be used when requested by the requester, after the DNS Stability Panel has completed its assessment and ICANN has notified the requester of evaluation results.

The EPSRP evaluation shall be carried out by way of review and comparison of the requested string against the ISO 646-BV two letter (a-z) codes and/or existing TLD strings and/or reserved names that, according to the DNS Stability Panel findings, are considered to be confusingly similar.

The EPSRP includes at a minimum one highly regarded specialists in neuropsychological or neurophysiological research in character recognition, shall use the evaluation results of an

appropriate research group, and shall take into account all the related documentation provided by the requester, including submitted additional documentation, IDN tables and the findings of the String Similarity Panel.

The report of the EPSRP shall include documentation of evaluation method used, its findings and in the case that the EPSRP finds there to be confusing similarity, a reference to the strings that are considered confusingly similar and to examples where the panel observed this similarity.. The findings of the EPSRP shall be reported to ICANN staff and will be publicly announced on the ICANN website.

4.3.1 EPRSP Framework

Scientific evaluation refers to using formal experimental techniques and the latest results from the research of the scientific community concerned with perception of writing and character recognition. In principle, the EPSRP should provide a scientifically founded, detailed and documented basis for conclusions regarding the potential for confusion.

Many areas of science, which focus on the brain, such as psychology and neuro- physiology, have focused attention on trying to understand how the brain processes written communications.

The latest results from this research community confirm that large-scale subjective evaluation, using a formal framework, is a preferred method for scientifically determining the potential for confusion between characters or strings of characters.

The methodology requires several hundred evaluators, is independent of script, and can easily be adapted to take into consideration the impact of character fonts and size.

For further details on the framework, see the 'Guidelines for the Extended Process Similarity Review Panel'.

5.5 String Confusion and Contention

String confusion exists where a string so nearly resembles another visually that it is likely to deceive or cause confusion. For the likelihood of confusion to exist, it must be probable, not merely possible that confusion will arise in the mind of the average, reasonable Internet user. Mere association, in the sense that the string brings another string to mind, is insufficient to find a likelihood of confusion.

String confusion issues can involve two or more strings that are identical or are so confusingly similar that they cannot coexist in the DNS, such as:

- Requested IDN ccTLD strings against existing TLDs and reserved names;
- Requested IDN ccTLD strings against other requested IDN ccTLD strings;

  and

- Requested IDN ccTLD strings against applied-for gTLD strings.

Contention situations between Fast Track requests and new gTLD applications are considered unlikely to occur. Assessments of whether strings are considered in conflict with existing or applied-for new gTLD strings are made during the DNS Stability Evaluation for Fast Track requests and in the Initial Evaluation step for new gTLD applications. The following supplemental rules provide the thresholds for solving any identified contention issues:

A. A gTLD application that is approved by the ICANN Board will be considered an existing TLD in inter-process contention unless it is withdrawn. Therefore, any other later application for the same string will be denied.

B. A validated request for an IDN ccTLD will be considered an existing TLD in inter-process contention unless it is withdrawn. Therefore, any other later application for the same string will be denied.

For the purpose of the above contention rules, an IDN ccTLD string request is regarded as validated once it is confirmed that the string is a meaningful representation of the country or territory and that the string has passed the DNS Stability Evaluation as described in Module 4.

### 5.6.3 DNS Stability Evaluation

The DNS Stability Evaluation Sub-Processes are graphically described in Figure 5.4, 5.5 and 5.6.

The request and associated material will be provided to the DNS Stability Panel (see Module 4 for details) and the string evaluation will begin. This evaluation consists of two main components:

i. a detailed technical check in which compliance with all the technical string requirements referenced in Module 3 is verified, and

ii. an evaluation of confusability with any Reserved Name, existing TLDs (both ccTLDs and gTLDs), or potential future TLDs.

If the DNS Stability Panel finds that additional linguistic expertise is necessary to satisfy the latter component of the evaluation, such can be requested through ICANN. ICANN will in return request assistance, specific information, or a full confusability review. The specific expertise needed will partly depend on the actual string in question.

If any issues with the selected string are discovered in this review, the DNS Stability Panel can request clarification from the requester through ICANN.

The DNS Stability Panel will usually conduct its review within 30 days, unless it informs ICANN staff otherwise, and delivers its report to ICANN staff, who communicates the findings to the requester.

In the event that the DNS Stability Panel determines a requested IDN ccTLD string is confusingly similar to any other than the existing two-letter ASCII ccTLD string corresponding to the same country or territory the IDN ccTLD string is requested for and the requester has been informed as such by ICANN, the requester may call for the second and final Extended Process Similarity Review and provide additional documentation and clarification referring to aspects in the report of the DNS Stability Panel. The requester should notify ICANN within three (3) calendar months after the date of notification by ICANN that a review by the EPSRP is requested, and include any additional documentation, if any. Additional documentation includes any supporting technical or linguistic materials the requester may want the panel to take into consideration when reviewing the string. After receiving the notification from the requester, ICANN shall call on the EPSRP.

The EPSRP conducts its evaluation of the string based on the methodology and criteria developed for it, as described in Module 4.3, and, taking into account, but not limited to, all the related documentation from the requester, including submitted additional documentation, IDN tables and the findings of the DNS Stability Panel. The EPSRP may seek further clarification from the requester through ICANN staff, if necessary.

The findings of the EPSRP shall be reported to ICANN and will be publicly announced on the ICANN website. This report shall include and document the findings of the EPSRP, including the rationale for the final decision and, in case of string similarity findings, a reference to the strings that are considered confusingly similar and examples where the panel observed this similarity.

If the requester has not notified ICANN within three (3) calendar months after the date of notification by ICANN of DNS Stability Panel findings, the Termination Process will be initiated. See section 5.4.

If according to the EPSRP the requested string should not be considered confusingly similar, the requested IDN ccTLD string is valid on string similarity grounds.

If the DNS Stability Evaluation reveals no issues the requester is notified that the DNS Stability Evaluation has successfully been completed and that the requested string(s) will be queued for public posting.

In the event that the DNS Stability Panel or the EPSRP determines a requested IDN ccTLD string is confusingly similar to an existing two-letter ASCII ccTLD corresponding to the same country or territory as the requesting country or territory entity, the DNS Stability Panel or the EPSRP shall document this in its report to ICANN.

If, at the time of the request or within two months after receiving the notification of the findings of the DNS Stability Panel, the requester, and, if considered necessary by ICANN, the relevant public authority, provide(s) a clarification that documents and demonstrates to ICANN that:

1. The intended manager for the requested IDN ccTLD and the manager for the existing two-letter ASCII ccTLD are one and the same entity; and

2. The intended manager shall request the delegation for the IDN ccTLD string if validated; and
3. The IDN ccTLD and ccTLD shall remain to be managed by one and the same entity, and
4. The intended manager shall agree to specific and pre-arranged conditions with the goal to mitigate the risk of user confusion as of the moment the IDN ccTLD becomes operational,

then the requested string is deemed to have passed the DNS Stability Panel evaluation.

If clarifications are insufficient or cannot be provided, the Termination Process will be initiated. See section 5.4.

Further, in the event that the DNS Stability Panel and/or EPSRP determines a requested IDN ccTLD string is confusingly similar to an existing TLD the DNS Stability Panel and/or the EPSRP shall document this finding in its report to ICANN.

If, at the time of the request or within three months after receiving the notification of the findings of the DNS Stability Panel or the EPSRP, the requestor, and, if considered necessary by ICANN, the relevant public authority, provide(s) a clarification that documents and demonstrates to ICANN that:

- The intended manager shall propose, agree upon and implement adequate pre-arranged risk mitigation measures with the goal to reduce the potential risk of user confusion as of the moment the IDN ccTLD becomes operational, including specific consideration of confusability from the perspective that any domain name may be displayed in any case (lower- or upper-case), depending on the software application and regardless of the user's familiarity with the language or script
- These measures are agreed upon by the time the delegation request of the IDN ccTLD string is submitted.

then the requested string is deemed to have passed the DNS Stability Panel and/or the EPSRP string evaluation.

If the intended IDN ccTLD manager does not propose mitigation measures or does not implement the agreed upon risk mitigation measures sufficiently within the timeline described above, the Termination Process will be initiated. See section 5.4.

To determine whether the proposed risk mitigation measures are adequate ICANN will consult experts in the area of relevant Risk Mitigation measures and the IDN ccTLD string requestor. The proposed measures are to be evaluated together with the finding of the confusability evaluation. The process is given in the Guideline for Risk Mitigation Measures Evaluation.

## 3.Guidelines referred in Fast Track Process

Guideline EPSRP: https://www.icann.org/en/system/files/files/epsrp-guidelines-04dec13-en.pdf

Guideline Risk Mitigation Measures Evaluation:
https://www.icann.org/en/system/files/files/guideline-risk-mitigation-measures-evaluation-28mar19-en.pdf

## 4.joint ccNSO SSAC Response to ICANN Board (on introduction of Risk Mitigation)

https://ccnso.icann.org/sites/default/files/field-attached/epsrp-final-response-17aug17-en.pdf