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AT-LARGE ADVISORY COMMITTEE

ALAC Statement on the Proposed Guidelines for the Second String Similarity Review Process

Introduction

In consultation with Cheryl Langdon-Orr, member of the Asian, Australasian and Pacific Islands Regional At-Large Organization (APRALO), Ariel Liang, Policy Analyst at ICANN, developed an initial draft of the ALAC Statement on behalf of the ALAC.

On 08 August 2016, the first draft of the Statement was posted on the [At-Large Proposed Guidelines for the Second String Similarity Review Process Workspace](#).

On that same date, Alan Greenberg, Chair of the ALAC, sent a Call for Comments on the Statement to the At-Large Community via the [ALAC Announce Mailing List](#).

On 18 August 2016, a version incorporating the comments received was posted on the aforementioned workspace and the Chair requested that Staff open an ALAC ratification vote.

On 24 August 2016, Staff confirmed that the online vote resulted in the ALAC endorsing the Statement with 14 votes in favor, 0 vote against, and 0 abstention. You may view the result independently under: <https://www.bigpulse.com/pollresults?code=5929CwdkTdWKvq5TqrQ3dydL>.

ALAC Statement on the Proposed Guidelines for the Second String Similarity Review Process

The ALAC appreciates the opportunity to participate in this Public Comment proceeding and commends the work of the ccNSO Extended Process Similarity Review Panel (EPSRP) Working Group.

The ALAC strongly supports the Working Group's specified [observations](#) on the process around confusing similarity of IDN ccTLDs. Specifically, the ALAC is in agreement with the Working Group's 'suggested way forward', which are as follows:

A clear, consistent set of rules for 'confusing similarity' should be in place and applied to both ccTLDs and gTLDs.

In the immediate term, the IDN ccTLD Fast Track process should be amended to take into account the following guiding principles:

- *ccTLD policy is a matter for the local internet communities to determine.*
- *A given IDN ccTLD application represents the free choice of a specific linguistic community that has every right to use its language and script in the DNS space. It is essential that the IDN ccTLD evaluation process should do everything possible to facilitate such requests from local communities.*
- *Where a finding of potential confusability has been made, rather than rejecting the application, the process should allow the applicant to propose mitigation measures.*
- *A pragmatic approach should be adopted to the issue of potential user confusion. It may not be possible to eliminate confusion entirely, and much user confusion takes place in context (phishing, URL clicking), rather than because of a TLD.*
- *Where there is a split recommendation (between upper case and lower case), the finding relating to the lower case shall prevail and the application shall go forward.*

The ALAC congratulates the EPSRP Working Group for making significant, positive impact on the overall ICANN policy for the selection of IDN ccTLD strings. The ALAC believes that the proposed guidelines will help promote linguistic diversity, mitigate the risk of user confusion, and preserve and ensure the security, stability, and interoperability of the DNS.