Expedited Policy Development Process on Internationalized Domain Names (EPDP on IDNs)

Update & Consultation with At-Large CPWG Re: Charter Questions A7, B4, D1b, E5 & E6

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Agenda

- Opening Remarks
  - EPDP process:
    Deliberation – draft Rec/IG text – **review** – stable text – ICANN org input – review – stable text – draft Initial Report – public comment proceeding
  - A charter question (CQ) can have several parts, requiring data/info to be compiled to answer
  - Note: we need to recap some relevant prior deliberations as context to today's presentation
- Input sought for Charter Topics A, B, D and E
  - **CQ a7** (partly new): Single char gTLD labels
  - **CQ d1b** (partly new) & **CQ b4** (entirely new):
    - Process to "***get***" allocatable variant TLD labels
    - Timing and sequence to "***get***" allocatable variant TLD labels
  - **CQ e5** (partly new): Reserved Names & Strings Ineligible for Delegation
  - **CQ e6** (entirely new): Decorated 2-char Latin labels

Charter Question a7

CQ a7: Single character gTLD labels (1/2)

- **CQ a7**
  - Part 1: How to identify scripts/languages appropriate for single-char TLDs?
  - **Part 2: How to identify a specific list of allowable characters within such scripts/ languages?** (SAC052: delegation of single-char IDN TLDs, Board 25 Aug 2011 reso)
  - **Part 3: Any specific implementation guidance (IG) to be provided?**

- **Context for Prior Deliberations to Part 1**
  - Affirming SubPro recommendation that single character gTLDs may be allowed for **ideographic scripts and languages**
  - Han script: only ideographic script in RZ-LGR; so, the Chinese language, the Kanji portion of the Japanese language, and the Hanja portion of the Korean language which all use the **Han script are appropriate for single-character gTLD**

- **Draft Recommendation**
  - Rec 1.14: The EPDP Team affirmed the Rec 25.4 in the SubPro PDP Final Report that single character gTLDs may only be allowed for limited scripts and languages where a character is an ideograph. At the time of the EPDP Team's deliberation, the script that meets the criteria is the Han script, which is used in the Chinese, Japanese and Korean languages. As such, applications for single character gTLDs that are ideographs will not be accepted until relevant guidelines from the Chinese, Japanese, and Korean Generation Panels are developed and implemented in the New gTLD Program.

CQ a7: Single character gTLD labels (2/2)

- **Rationale**
  - Affirms SubPro Rec 25.4, single-char TLDs allowable only for ideographic scripts/languages
  - Follows SAC052, ICANN Board resolution of 25 Aug 2011
    - SAC052 said if a script allowed for single-char TLDs, then limits advisable as single-char TLDs are more likely to cause user confusion than TLDs with > one char
    - Board reso said technical & policy considerations must be addressed prior to delegation of any single-character TLDs
  - List of allowable chars will increase predictability for applicants
  - But EPDP Team lacks linguistic expertise to handle such a list; and since only Han script relevant, consulted CJK GPs
  - Result is CJK GPs requested to look into possibility of prohibitive list of Han chars, use GPs processes which is subject to public comment proceedings
  - In line with SAC052, Board reso: EPDP agreed that applications for single-char gTLDs not allowed until CJK GPs guidelines developed and implemented in Program

- **Our Proposed Response: Agree; also consider getting a commitment from the CJK GPs on timing to complete their work on guidelines**

Charter Question d1b Part 1

CQ d1b: Process to "*get*" variant labels (1/2)

CQ d1b - Part 1

- **What should be the process by which an existing RO could apply for, or be allocated, a variant for its existing gTLD?**

Context

- Of 1,265 existing gTLDs, only 35 Chinese gTLDs and 9 Arabic gTLDs have allocatable variant labels per RZ-LGR
- Surveyed ROs of those 35+9 gTLDs => 64.7% response: interest in getting variant labels but no conclusive view on desired application timeframe and factors influencing the same
- Led to some support for a simplified, standalone process for these ROs, so EPDP Team spent time examining feasibility for the same – cost & complexity
- Although EPDP Team concluded separate process not feasible, did want to assign some sort of priority for applications by existing ROs for their allocatable variant labels

Draft Recommendations

- Rec 2.9: Applications for allocatable variant labels of existing IDN gTLDs from the 2012 round can be submitted during the next round of the New gTLD Program and any subsequent rounds.
- Rec 2.10: As a one-time exception, applications for allocatable variant labels of existing IDN gTLDs from the 2012 round **must receive priority in processing order ahead of all other new gTLD applicants, including the IDN applicants that elect to participate in the prioritization draw during the next round**.

CQ d1b: Process to "*get*" variant labels (3/3)

- **Rationale**
  - After examining the process flow for processing/evaluating applications, EPDP Team observed:
    - An application for an IDN variant label must go through the same steps and stages as any other
    - A number of elements in Program will require modification per SubPro & EPDP recommendations for variants
  - So, EPDP Team agreed most expedient and cost effective path forward for existing registry operators to apply for variants of their existing IDN gTLDs is through the next round. Therefore, no separate process.
  - Affirms SubPro Rec 19.3 in seeking to ensure IDN gTLD application are prioritized in processing in next round
  - Goes further to give existing ROs some priority in processing of their applications for allocatable variant labels
  - In other words, the variant label applications from existing IDN gTLD registry operators must be processed first among the applications that are being prioritized.

- **Our Proposed Response: Agree**

Charter Question d1b Part 1

CQ b4: Timing and sequence to "*get*" allocatable variant TLD labels (1/2)

- **CQ b4**
  - **What should an application process look like in terms of timing and sequence for an existing and future RO with respect to applying or activating their allocatable variant TLD labels?**

- **Context**
  - The possible combination of applications: (1) a primary IDN gTLD only; or (2) a primary IDN gTLD and one or more allocable variant label(s) simultaneously; or (3) one or more allocatable variant label(s) of an already delegated IDN gTLD
  - Does sequence and timing of **application** matter? What about **delegation**?

- **Draft Recommendations**
  - Rec 2.11: An application for an **allocatable variant label cannot precede** an application for that variant label's **primary IDN gTLD**.
  - Rec 2.12: A registry operator who wishes to apply for an allocatable variant label of its delegated IDN gTLD must submit an application during an application round.
  - Rec 2.13: Applicants for a primary IDN gTLD and requested allocatable variant label(s) that pass evaluation will be subject to the terms and conditions of the 2012 round in respect of the timeframe for delegation, including the ability to apply for an extension of time for delegation.
  - Rec 2.14: The **sequence for delegating** the applied-for primary IDN gTLD and the requested allocatable variant label(s) that pass evaluation **can be determined by the registry operator**.

CQ b4: Timing and sequence to "*get*" allocatable variant TLD labels (2/2)

Rationale

- **Rec 2.11: Order of application matters** – because a label's status as a "variant" is determined by the primary IDN gTLD - the source label generates allocatable and blocked variant labels set per RZ-LGR
- **Rec 2.12:** The most expedient and cost effective path for all ROs to apply for variant labels is through application rounds.
  - Regular intervals between application rounds are expected, so ROs could adequately rely on application rounds to apply for variant labels.
  - No need for separate process for existing ROs to apply for variants of their existing IDN gTLDs
- **Rec 2.13:** But all labels which pass evaluation must be delegated within existing stipulate timeframe – no reason to deviate from this, to avoid creating excessive complexity.
  - 12-month + any extended timeframe granted by ICANN org to the RO of up to 12 additional months
- **Rec: 2.14: Order of delegation matters less, if at all** – so, no order stipulated:
  - In absence of security or stability issues
  - The fact that all these labels are regarded as individual gTLDs in the rootzone
  - Need not be mandated by policy, should be at RO's discretion according to their respective business interests and needs as stated in their application.
    - An eg where a variant label may be delegated before the primary IDN gTLD.
      - ".straße" as primary label + its allocatable variant label ".strasse" requested; both pass evaluation.
      - RO decides to delegate ".strasse" first as it is an ASCII label that can readily cater to the international market, and wait to delegate ".straße" as it is an IDN string.
      - Note that with ".strasse" as primary gTLD string, ".straße" is blocked variant per RZ-LGR

Our Proposed Response: Agree

Charter Question e5

CQ e5: Reserved Names & Strings Ineligible for Delegation (1/2)

- **CQ e5**
  - Should the reserved strings ineligible for delegation for existing and future gTLDs be updated to include any possible variant labels?

- **Context for Prior Deliberations on Reserved Names**
  - This CQ is intended to address: 1) Reserved Names and **2) Strings Ineligible for Delegation**.
  - Purpose of the Reserved Names is to maintain the exclusive rights to the names of ICANN, its bodies, or essential related functions of ICANN and IANA.
  - No need to expand Reserved Names list to include variants - all Reserved Names, except for IDN “test” strings, are ASCII strings and only have blocked variants, so cannot be applied for; no utility in expanding list to include hundreds of thousands of variants – introduces unnecessary complexity
  - But EPDP Team agreed that variants of Reserved Names cannot be applied for.

- **Draft Recommendations on Strings Ineligible for Delegation**
  - Rec 3.10: The list of Strings Ineligible for Delegation should not be expanded to include variants.
  - Rec 3.11: Only the protected organizations on the list of Strings Ineligible for Delegation are allowed to apply for the allocatable variant(s) of their protected string(s) at the top-level. Consistent with Recommendation 2.11, an application for an allocatable variant label of a protected string cannot precede an application for the protected string, which serves as the primary or source string for generating the variant label.

CQ e5: Reserved Names & Strings Ineligible for Delegation (2/2)

- **Rationale for Draft Recommendations**
  - Purpose of the Strings Ineligible for Delegation is to provide special protections at TL & SL for names and acronyms of IGOs and INGOs, which receive protections under treaties and statutes across multiple jurisdictions – eg the *Red Cross/Red Crescent Movement (RCRC)* and the *International Olympic Committee (IOC)*
  - Prior PDP on the Protection of IGO and INGO Identifiers in All gTLDs explored in detail whether those orgs should receive special protection for their names => specific, finite list of identifiers included in AGB, to grant preventative protections to the identifiers limited to **exact match and on the basis of internationally recognized treaties**; there is a specific process for those orgs to modify or expand the list – out of scope for EPDP
  - So, EPDP Team agreed that the **Strings Ineligible for Delegation list should stay as is and no variants should be added**.
  - But EPDP Team also agreed that **no application for a variant of a String Ineligible for Delegation should be allowed** - intended to ensure that the variants are unavailable to other applicants rather than adding variants to the list of Strings Ineligible for Delegation, even if likelihood of an unrelated entity applying for a variant of a protected string is small and there are other measures to deter such applications (e.g., GAC Early Warning, GAC Advice, Objection Processes).

- **Our Proposed Response: Agree**

Charter Questions e6

CQ e6: Decorated 2-char Latin labels

- **CQ e6**
  - Is there any reason to permit the registration of gTLDs consisting of **decorated two-character Latin labels** which are not variant labels of any two-letter ASCII labels?

- **Context**
  - Standards used in String Similarity Review from 2012 round will continue in future rounds, per SubPro Affirmation 24.2.
  - Specifically, **an applied-for two-character string, regardless of script or language**, will be reviewed for visual similarity to any two-character ASCII combination in order to **protect possible future ccTLD delegations**.
  - So, an applied-for string consisting of decorated two-character Latin labels will be evaluated for visual similarity to any two-character ASCII combination. A string that does not pass the evaluation will not be able to proceed in the application process.
  - Can just rely on existing process of String Similarity Review to catch any applied-for string in any script, not limited to the Latin script, that may be potentially confusable with a two-character ASCII combination. EPDP Team noted that such confusability issues may also exist in other scripts, such as Cyrillic, Ethiopic, Gujarati, Hebrew, and Malayalam scripts.

- **Draft Recommendation:** Not needed
- **Our Proposed Response: Agree**

The End

Thank you for your input.

Appendix – Variant Labels Set Explained

A real example of RZ-LGR output for an Arabic label

Allocatable means available for delegation but must still be applied for delegation

#	Type	U-label	A-label	Disposition	Code point sequence
1	original	شبكة	xn--ngbc5azd	valid	U+0634 U+0628 U+0643 U+0629
2	varlabel	شبكه	xn--ngbx0cq	allocatable	U+0634 U+0628 U+0643 U+0647
3	varlabel	شبكهٔ	xn--ngbx0c15a	blocked	U+0634 U+0628 U+0643 U+06BE
4	varlabel	شبكهٔ	xn--ngbx0c95a	blocked	U+0634 U+0628 U+0643 U+06C0
5	varlabel	شبكهٔ	xn--ngbx0cy6a	blocked	U+0634 U+0628 U+0643 U+06C1
6	varlabel	شبكهٔ	xn--ngbx0c26a	blocked	U+0634 U+0628 U+0643 U+06C2
7	varlabel	شبكهٔ	xn--ngbx0c66a	allocatable	U+0634 U+0628 U+0643 U+06C3
8	varlabel	شبكه	xn--ngbx0c31b	blocked	U+0634 U+0628 U+0643 U+06D5
9	varlabel	شبكة	xn--ngbc5az1b	allocatable	U+0634 U+0628 U+06A9 U+0629
10	varlabel	شبكه	xn--ngbx2d5u	allocatable	U+0634 U+0628 U+06A9 U+0647
11	varlabel	شبكهٔ	xn--ngbx66ayc	blocked	U+0634 U+0628 U+06A9 U+06BE
12	varlabel	شبكهٔ	xn--ngbx66a6c	blocked	U+0634 U+0628 U+06A9 U+06C0
13	varlabel	شبكهٔ	xn--ngbx66agd	blocked	U+0634 U+0628 U+06A9 U+06C1
14	varlabel	شبكهٔ	xn--ngbx66akd	blocked	U+0634 U+0628 U+06A9 U+06C2
15	varlabel	شبكهٔ	xn--ngbx66aod	allocatable	U+0634 U+0628 U+06A9 U+06C3
16	varlabel	شبكه	xn--ngbx66a0f	blocked	U+0634 U+0628 U+06A9 U+06D5
17	varlabel	شبكة	xn--ngbc5a31b	allocatable	U+0634 U+0628 U+06AA U+0629
18	varlabel	شبكه	xn--ngbx2d9u	allocatable	U+0634 U+0628 U+06AA U+0647
19	varlabel	شبكهٔ	xn--ngbx96asc	blocked	U+0634 U+0628 U+06AA U+06BE
20	varlabel	شبكهٔ	xn--ngbx96a0c	blocked	U+0634 U+0628 U+06AA U+06C0
21	varlabel	شبكهٔ	xn--ngbx96a4c	blocked	U+0634 U+0628 U+06AA U+06C1
22	varlabel	شبكهٔ	xn--ngbx96a8c	blocked	U+0634 U+0628 U+06AA U+06C2
23	varlabel	شبكهٔ	xn--ngbx96ahd	allocatable	U+0634 U+0628 U+06AA U+06C3
24	varlabel	شبكه	xn--ngbx96arf	blocked	U+0634 U+0628 U+06AA U+06D5