

## Rationale for Not Implementing Implementation Guidance 25.3 of SubPro

SubPro recommendation 25.2 says that “Compliance with Root Zone Label Generation Rules must be required for the generation of TLDs and variants labels, including the determination of whether the label is blocked or allocatable.” However, as an exception to the recommendation, the SubPro Implementation Guidance suggests that:

- **Implementation Guidance 25.3:** If a script is not yet integrated into the RZ-LGR, applicants should be able to apply for a string in that script, and it should be processed up to but not including contracting. Applicants under such circumstances should be warned of the possibility that the applied-for string may never be delegated and they will be responsible for any additional evaluation costs.

[Root Zone Label Generation Rules Version 5](#) (RZ-LGR-5) is now available, covering the following 26 scripts out of the 28 scripts shortlisted to be included in RZ-LGR.

- Arabic, Armenian, Bangla, Chinese (Han), Cyrillic, Devanagari, Ethiopic, Georgian, Greek, Gujarati, Gurmukhi, Hebrew, Japanese (Hiragana, Katakana, and Kanji [Han]), Kannada, Khmer, Korean (Hangul and Hanja [Han]), Lao, Latin, Malayalam, Myanmar, Oriya, Sinhala, Tamil, Telugu, and Thai.

The remaining two scripts identified to be included in RZ-LGR are Thaana and Tibetan scripts.

These 28 scripts are shortlisted out of the total 161 scripts in its latest Unicode version 15.1. The scripts are shortlisted by the Integration Panel as per the [RZ-LGR Procedure](#) based on multiple factors, including the principles identified for formulating domain names in different scripts (e.g. [RFC 6912](#)), and assessment provided by the Unicode standard on the scripts recommended for identifiers in its [Unicode Identifiers And Syntax](#) report. In this report, the Unicode standard categorizes the scripts into those which are “recommended” for identifiers (like domain name labels), and also identifies scripts which it suggests are “limited use” or “excluded” for use as identifiers (Tables 4, 5 and 7).

The scripts “recommended” by the Unicode standard are the 28 scripts shortlisted for integration into RZ-LGR (Table 5). For limited-use scripts (Table 7) the Unicode standard notes: “To avoid security issues, some implementations may wish to disallow the limited-use scripts in identifiers.” For excluded scripts (Table 4) the Unicode standards notes: “Some scripts are not in customary modern use, and thus implementations may want to exclude them from identifiers. ...Some scripts also have unresolved architectural issues that make them currently unsuitable for identifiers.”

The RZ-LGR Procedure allows for additional scripts to be integrated into future versions of the RZ-LGR if the script is in general purpose and modern use and the relevant script community formulates a Generation Panel and develops a proposal meeting the requirements of the RZ-LGR Procedure.

ICANN org notes that the exception in the implementation guidance is not straightforward to implement, especially up to the point of contracting, because of the following reasons:

1. [IDN EPDP Phase 1 Final report](#) recommends restricting applied-for gTLD strings to those which conform to RZ-LGR:
  - **Final Recommendation 3.22:** Only an applied-for gTLD string that conforms to the mandatory string requirements, including IDNA 2008 for IDN strings, as well as the RZ-LGR, can be submitted through the new gTLD application submission system.
2. If the application system accepts the string and takes it through the application review process (as per IG25.3) it can face processing issues at different stages:
  - a. The applied-for string may be rejected by the DNS Stability Review panel as there is no clear guidance available to the panel on how to evaluate the script or the specific elements of the string through RZ-LGR and Recommendation 3.22 from IDN Expedited Policy Development Process (EPDP) establishes this as a criterion for the string.
  - b. The applied-for string would not be able to go through the String Similarity Review process, as this step needs definition of variant strings, as per the recommendations in IDN EPDP Phase 1 Final Report. However, it is not possible to determine the variants of the string without integration of the script into the RZ-LGR.
  - c. There will be an impact to other parties beyond just the applicant. In particular, parties that determine they must file an objection would be doing so against an application that might never be contracted and delegated.
3. Alternatively, if the application system accepts the string and puts it immediately on hold, it could remain on hold for an unpredictably long amount of time. With most of the “recommended” scripts integrated into the RZ-LGR, it is less likely that additional scripts (beyond Thaana and Tibetan) would be integrated soon. Even at a fast pace, a Generation Panel may take a couple of years to integrate a script into the RZ-LGR. There is a possibility that the script may never be integrated in case the Generation Panel does not form or is not able to formulate a suitable proposal for integration for the script.
4. Even if ICANN manages to hold the strings for an indeterminate amount of time, it would not be a favorable situation for the applicants. A determinate option for such potential applicants is the following:
  - a. The potential applicant first works with the script community to integrate the relevant script into the RZ-LGR first, following the [RZ-LGR Procedure](#). ICANN will support this process actively.

- b. Once the RZ-LGR has been updated to include the script, then the applicant can apply in a subsequent round for a deterministic string evaluation in a predictable timeline.
5. Taking this option will provide a consistent solution for gTLDs and ccTLDs, as also [resolved](#) by the ICANN Board. IDN country code Policy Development Process 4 (ccPDP4) Working Group is finalizing a recommendation for applicants of strings in scripts not integrated in the RZ-LGR. The WG proposes that if, at the time the requested IDN ccTLD string is submitted for validation, the RZ-LGR for the relevant script has not been generated or is not yet integrated in the RZ-LGR, then ICANN shall inform the requester to amend or withdraw the request. Such a string may only proceed for strings integrated in RZ-LGR. It should be noted that IDN ccTLD applications are evaluated on a rolling basis.