

## 5 Differences between EPDP-IDNs and ccPDP4 Preliminary Recommendations

### 5.1 Background

On 14 March 2019, the ICANN Board approved a set of recommendations for managing the IDN variant TLDs that were developed by ICANN org in the “Staff Paper”. At this time the Board also requested that the:

- ccNSO and GNSO taking into consideration the variant TLD recommendations in the Staff Paper while developing their respective policies to define and manage the IDN variant TLDs for the current TLDs as well as future TLD applications; and
- ccNSO and GNSO keep each other informed of the progress in developing the relevant details of their policies and procedures to ensure a consistent solution, based on the variant TLD recommendations, is developed for IDN variant ccTLDs and IDN variant gTLDs.

In 2021, the GNSO and the ccNSO commenced their respective PDPs dedicated to IDNs:

- the GNSO Council approved the charter for an Expedited Policy Development Process on IDNs (“EPDP-IDNs”) in May 2021;<sup>152</sup> and
- the ccNSO Council approved the charter for Policy Development Process 4 on the (de) Selection of IDN ccTLD Strings (“ccPDP4”) in August 2021.<sup>153</sup>

In response to the Board’s request that the two efforts keep each other informed, the EPDP-IDNs and ccPDP4 appointed liaisons to the respective efforts to identify potential issues and share information. The PDP groups also meet periodically to discuss the alignment of their preliminary recommendations. In addition, the ICANN org staff that support both efforts are also in regular contact.

The EPDP Team has identified preliminary recommendations under four topics covered by both EPDP-IDNs and ccPDP4 where differences exist. However, these differences are largely considered reflective of fundamental differences that already exist in the management and operation of ccTLDs and gTLDs, and their associated application processes, rather than an inconsistent application of the variant TLD recommendations.

The EPDP Team conducted an analysis of the differences, from the gTLD perspective and the findings are provided below. It should be noted that the preliminary recommendations from

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<sup>152</sup> EPDP-IDNs charter:

<https://gns0.icann.org/sites/default/files/policy/2021/presentation/CharterGNSOIDNsEPDPWorkingGroup20May21.pdf>

<sup>153</sup> ccPDP4 charter:

<https://community.icann.org/download/attachments/138969190/Draft%20Charter%20ccPDP4%20WG.pdf?version=1&modificationDate=1592141220002&api=v2>

EPDP-IDNs and ccPDP4 may be modified in the future following their respective Public Comment processes.

## 5.2 Analysis of Preliminary Recommendations with Differences

No.	Topic	EPDP-IDNs	ccPDP4
1	<b>Variant label disposition</b>	“Allocatable” and “blocked” (see <a href="#">Section 3: Glossary</a> )	“Delegatable”, “allocatable”, and “blocked” (see <a href="#">Annex A: Specific Terminology Used in Policy Proposal</a> )
<p><b>Summary of Differences:</b> EPDP-IDNs agreed to use the disposition values of allocatable or blocked variant labels as specified in the RZ-LGR. ccPDP4 created an additional disposition value of “delegatable”, which means an allocatable variant label that is a meaningful representation of the name of a territory in a designated language or script in which the territory is expressed.</p>			
<p><b>Analysis:</b> The EPDP Team believes this difference in disposition values is acceptable and reflects one of the primary differences between a ccTLD and a gTLD in that a ccTLD ultimately represents a country or territory name. It is not necessary for the EPDP to also adopt the ‘delegatable’ disposition value as it would have no meaning in the gTLD landscape.</p>			
2	<b>Limiting number of delegated variant labels</b>	<p><u>Preliminary Recommendation 8.1:</u> No ceiling value for delegated top-level variant labels from a variant label set is necessary as existing measures in the RZ-LGR to reduce the number of allocatable top-level variant labels, as well as economic, operational, and other factors that may impact the decision to apply for variant labels, will keep the number of delegated top-level variant labels conservative.</p>	<p><u>3.2.3:</u> Limitation of delegation of variants. Only Allocatable VARIANTS of the selected IDNccTLD string that are Meaningful Representations of the name of the Territory in the [Designated] Language according to section 1.1-1.8 and section 2.1 and 2.2, are eligible to be delegated.</p>
<p><b>Summary of Differences:</b> EPDP-IDNs agreed not to impose a ceiling value on the number of allocatable variant labels that can be applied for as gTLDs, whereas ccPDP4 agreed that only a subset of allocatable variant labels that are a meaningful representation of territory names can be requested as ccTLDs.</p>			
<p><b>Analysis:</b> The EPDP Team does not consider these preliminary recommendations to be inconsistent. The ccPDP4 has not placed a ceiling on the number of allocatable variant labels, but the preliminary recommendation does state that only allocatable variant labels that are ‘meaningful representations of the name of the Territory in the</p>			

No.	Topic	EPDP-IDNs	ccPDP4
	<p>[Designated] Language according to section 1.1-1.8 and section 2.1 and 2.2, are eligible to be delegated.</p> <p>The EPDP Team acknowledges that this qualification may be seen by some as creating an artificial ceiling and it is noted in the deliberations on this topic the Team came to appreciate that there are also factors that serve to create an artificial ceiling for IDN gTLDs as well. For example, only seven scripts in the current RZ-LGR have allocatable variant labels and except for the Arabic script, the other six scripts already have ceiling values that will limit the number of allocatable variant labels that can be applied for.</p>		
3	<p><b>Impact on delegated TLDs due to RZ-LGR update</b></p>	<p><u>Preliminary Recommendation 8.6:</u> Any delegated gTLDs and their delegated and allocated variant labels (if any) not validated by a proposed RZ-LGR update must be grandfathered. In other words, the proposed update will apply to future new gTLDs and their variant labels and will not be retrospective; there will be no change to the contractual and delegation status of delegated gTLDs and their delegated and allocated variant labels (if any), which predate the proposed RZ-LGR update and are subject to the version of RZ-LGR when those gTLDs and variant labels were initially applied for upon the finalization of the application process.</p>	<p><u>3.2.4:</u> It is expected that the RZ-LGR be revised throughout its lifecycle, because a new script LGR is being integrated or a revision of an existing script LGR is being integrated into the Root Zone LGR. There may be a case where the update in the Root Zone LGR does not support an existing IDN ccTLD. In such a case, the delegated IDN ccTLD(s) must be grandfathered, unless grandfathering would demonstrably threaten the stability and security of the DNS and deselection of a delegated IDN ccTLD string is demonstrably the only measure to mitigate such a threat.</p>
<p><b>Summary of Differences:</b> EPDP-IDNs agreed that all delegated gTLDs and their delegated and allocated variant labels must continue to exist despite any RZ-LGR update, whereas ccPDP4 agreed that grandfathering is not absolute and a ccTLD should be removed if its deselection is demonstrably the only measure to mitigate the threat to the stability and security of the DNS.</p>			
<p><b>Analysis:</b> The EPDP Team understands that all future updates to the RZ-LGR should aim to retain full backward compatibility with delegated gTLDs to maintain stability of the root zone and as such believes the probability that an update will invalidate a delegated gTLD is extremely low. The EPDP Team acknowledges that the ccPDP4 preliminary recommendation accounts for the possibility of deselection in specific circumstances; however, the EPDP Team believes that fundamentally the preliminary recommendations of the EPDP Team and ccPDP4 are consistent as they both support grandfathering a TLD that has been invalidated by an update to the RZ-LGR.</p>			

No.	Topic	EPDP-IDNs	ccPDP4
4	<b>String Similarity Review</b>	<p><u>Preliminary Recommendation 4.1-4.3</u>: The Hybrid Model as summarized below (see details in Section 4.4):</p> <p>At a minimum, the String Similarity Review must compare an applied-for primary gTLD string (no matter whether it is an ASCII string or an IDN string) and all of its allocatable and blocked variant labels against the following, with the exclusion of comparing a blocked variant label against other blocked variant labels:</p> <ul style="list-style-type: none"> <li>● all existing gTLDs and ccTLDs and all of their allocatable and blocked variant labels; and</li> <li>● requested ccTLD strings and all of their allocatable and blocked variant labels; and</li> <li>● other applied-for gTLD strings and all of their allocatable and blocked variant labels; and</li> <li>● any other two-character ASCII strings (if the applied-for gTLD string is a two-character string) and all of their allocatable and blocked variant labels; and</li> <li>● all strings on the Reserved Names list and all of their allocatable and blocked variant labels.</li> </ul> <p>As an exception, the String Similarity Review Panel may, in line with guidelines and/or criteria to be developed during</p>	<p><u>4.1.2.3</u> A Selected string, and its Requested, Delegatable Variants should not be confusingly similar with:</p> <ul style="list-style-type: none"> <li>● Any combination of two ISO 646 Basic Version (ISO 646-BV) characters (letter [a-z] codes), nor</li> <li>● Existing TLDs, which includes the already delegated variants or reserved names, nor</li> <li>● Proposed TLDs which are in process of string validation and their requested Delegatable or requested variants (however defined under the ccTLD and gTLD processes)</li> </ul> <p>The Similarity Evaluation Panel should determine the additional variants of the basic set of strings included in the Comparison Side, factoring in:</p> <ul style="list-style-type: none"> <li>● The likelihood of misconnection</li> <li>● Scalability, and</li> <li>● Unforeseen and/or unwanted side effect.</li> </ul>

No.	Topic	EPDP-IDNs	ccPDP4
		implementation, decide whether and what blocked variant labels to omit when conducting comparison on the basis of a manifestly low level of visual confusability between the scripts of labels being compared.	
<p><b>Summary of Differences:</b> EPDP-IDNs agreed that the String Similarity Review must extend its visual similarity checks for the entire variant label set of an applied-for primary gTLD string, with some exceptions. ccPDP4 agreed to conduct visual similarity checks for the requested, delegatable strings, but the String Evaluation Panel may expand the comparison by including allocatable (and blocked, if needed) variant labels.</p>			
<p><b>Analysis:</b> The differences are considered acceptable because the preliminary recommendations, while not the same, are developed in the context of the respective application processes for a new IDN gTLD and IDN ccTLD. The main difference in the processes being that gTLD strings are applied for in dedicated rounds that could result in hundreds if not thousands of applications being evaluated simultaneously, whereas an ccTLD can be applied for at any time and evaluations are discrete. The purpose and the intent of both string similarity review processes is considered consistent – it is only the manner in which this is done that differs.</p>			

### 5.3 Additional Topics with Differences

The EPDP-IDNs and ccPDP4 each have a distinct scope and remit. Therefore, some topics addressed by the EPDP Team are not addressed by ccPDP4 and vice versa. The EPDP Team identified some examples, including the single-character gTLD applications (see EPDP Team [Preliminary Recommendation 3.17](#)) and delegation timeframes of approved IDN gTLDs and variant labels (see EPDP Team [Preliminary Recommendation 8.4-8.5](#)). The EPDP Team also noted that the ccPDP4 has limitations with regard to developing policy recommendations pertaining to ccTLD registrations at the second-level, whereas it is within the remit of the EPDP-IDNs to develop policy recommendations for IDN variant management mechanisms at the second-level during Phase 2 of its deliberations.

Furthermore, the EPDP Team recognized that the ccPDP4 and SubPro PDP have different recommendations regarding the treatment of an applied-for gTLD string whose script is not yet integrated into the RZ-LGR. The SubPro PDP recommends that such an application should be accepted and processed up to but not including contracting, whereas the ccPDP4 recommends that such an application cannot proceed for evaluation until the relevant script is integrated into

the RZ-LGR.<sup>154</sup> The EPDP Team noted that the SubPro PDP developed such a recommendation based on the belief that the applicant should be provided the opportunity to apply for such a string, but the onus is on the applicant, who may have to wait for an indeterminate amount of time until the script of the applied-for string is integrated into the RZ-LGR.

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<sup>154</sup> See Implementation Guidance 25.3 in the SubPro Final Report, p.115:

<https://gnso.icann.org/sites/default/files/file/field-file-attach/final-report-newgtld-subsequent-procedures-pdp-02feb21-en.pdf#page=115>. The ICANN Board has adopted this Output as part of its resolution in March 2023: <https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-16-03-2023-en>. See ccPDP4's [5.4.2](#) Conformity to RZ-LGR: "...If at the time the requested IDNccTLD string is submitted for validation the LGR for the writing system or script in which the Designated Language is expressed has not been generated or is not yet integrated in the RZ-LGR, or if the selected IDNccTLD string is not in compliance with the RZ-LGR, ICANN shall inform the requester and section 5.2.2 sub C. applies accordingly."

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