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

Presentation #1 on the Phase 1 Initial Report

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3 May 2023

ICANN
AT-LARGE

Agenda

- Overview & Timetable
- EPDP's remit is focused on **Variant Management policies**
  - Recap: Understanding Variants – The Basics
- Structure of Initial Report
- Substance (for today)
  - 4 Underlying Principles, incl. Sec 4.1 & Sec 4.2: 1 Preliminary Recommendation ("PR") each
  - Sec 4.3: 24 PRs & Implementation Guidance ("IG")
- Approach
  - Present all PRs & IGs but only highlight / discuss those with clear/indirect end-user impact
  - Resort to grouping PRs/IGs logically – to show connection & consequences
  - However, can't avoid alluding to processes – necessary background information
  - ALAC Team has 4 members – 2 teams of 2 persons to cover rotating CPWG call times
  - Expected output – ALAC Statement containing input from consultations with CPWG

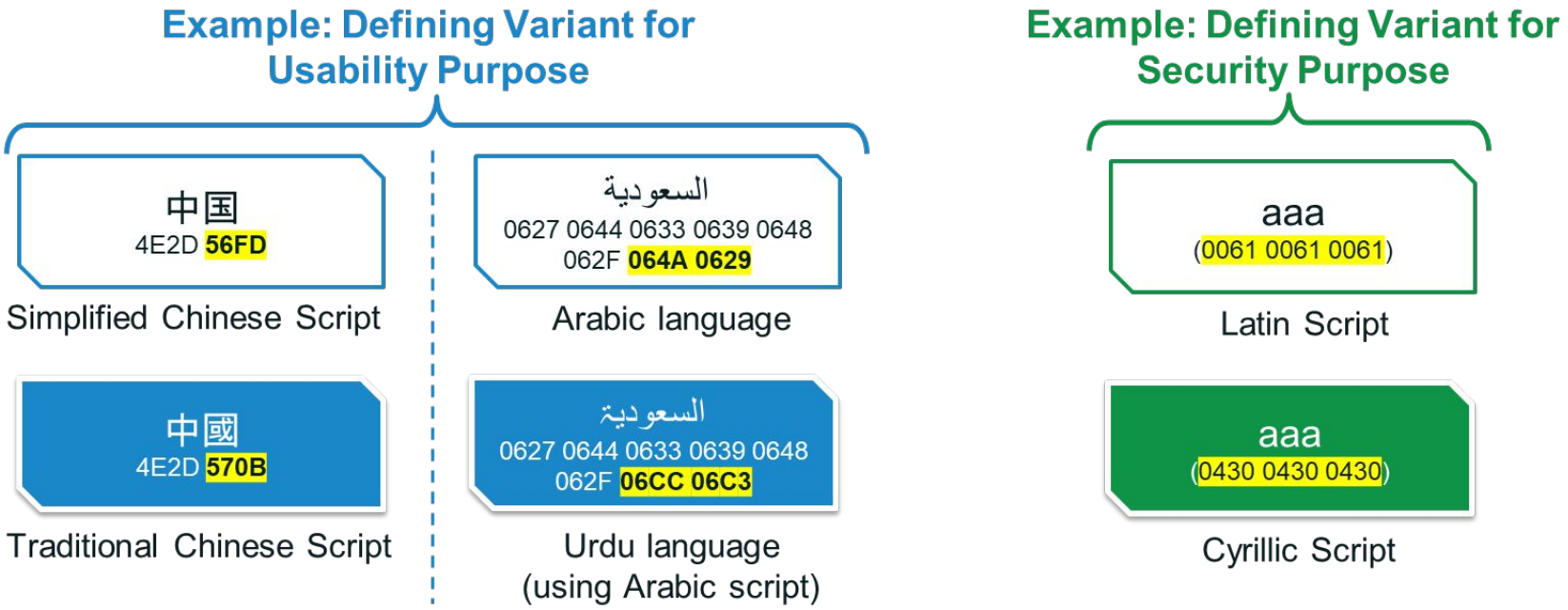
IDNs EPDP Phase 1 Initial Report: Overview

- Public Comment Proceedings: 25 Apr – 5 Jun 2023
- Link to Initial Report:
  https://itp.cdn.icann.org/en/files/internationalized-domain-names-idn/phase-1-initial-report-internationalized-domain-names-expedited-policy-development-process-24-04-2023-en.pdf
- Phase 1 covers policy questions at the top-level:
  - Topic A: Consistent definition & technical utilization of the RZ-LGR
  - Topic B: “Same entity” at the top-level
  - Topic D: Adjustments in RA, registry service, registry transition process, other DN lifecycle processes/ procedures
  - Topic E: Adjustments to string similarity review, objection process, string contention resolution, reserved strings, and other policies & procedures
- 68 Preliminary Recommendations (PRs) & Implementation Guidance (IG)
- Anticipated timetable for presentation to / consultation with CPWG (assuming no extension of deadline)

3 May	10 May	17 May	24 May	31 May	2 Jun	5 Jun
Presentation #1	Presentation #2	Presentation #3	Presentation #4	Discuss Draft ALAC Statement	ALAC Vote	Submission

Recap – Understanding Variants: The Basics

- **Variant Labels** are considered **'the same**' by respective script community



IDNs EPDP Phase 1 Initial Report: The Structure

- During its initial deliberations, the EPDP Team decided to divide the CQs into two phases in order to avoid delaying the next steps towards a new Round.
- All CQs that had any impact on the new Round was bundled into the Phase 1, whose initial report is now available for Public Comments.
- The EPDP Team continues its work with the remaining CQs, which are mostly about IDN variants at the second level
- While most of the recommendations of the Phase 1 Initial Report are more relevant to the Application process as well as to Registries & Registrars, there are several that have an end-user impact
- The Phase 1 Initial Report starts out with an Executive Summary, followed by the EPDP Team approach and a Glossary
- The report then groups the Preliminary Recommendations and Implementation Guidance under 10 categories
- The report then highlights the differences the EPDP's work on variants and that of CCPDP4 and also the Next Steps for the Phase 1 report

Classification of Recommendations

4.1 RZ-LGR as the Sole Source

4.2 Same Entity Principle

4.3 Application Submission, Administrative Check, Initial Evaluation

4.4 String Similarity Review

4.5 Objection Processes

4.6 String Contention

4.7 Contractual Requirements

4.8 Delegation and Removal

4.9 Variant Label States

4.10 Charter Questions with No Preliminary Recommendations

Annexes

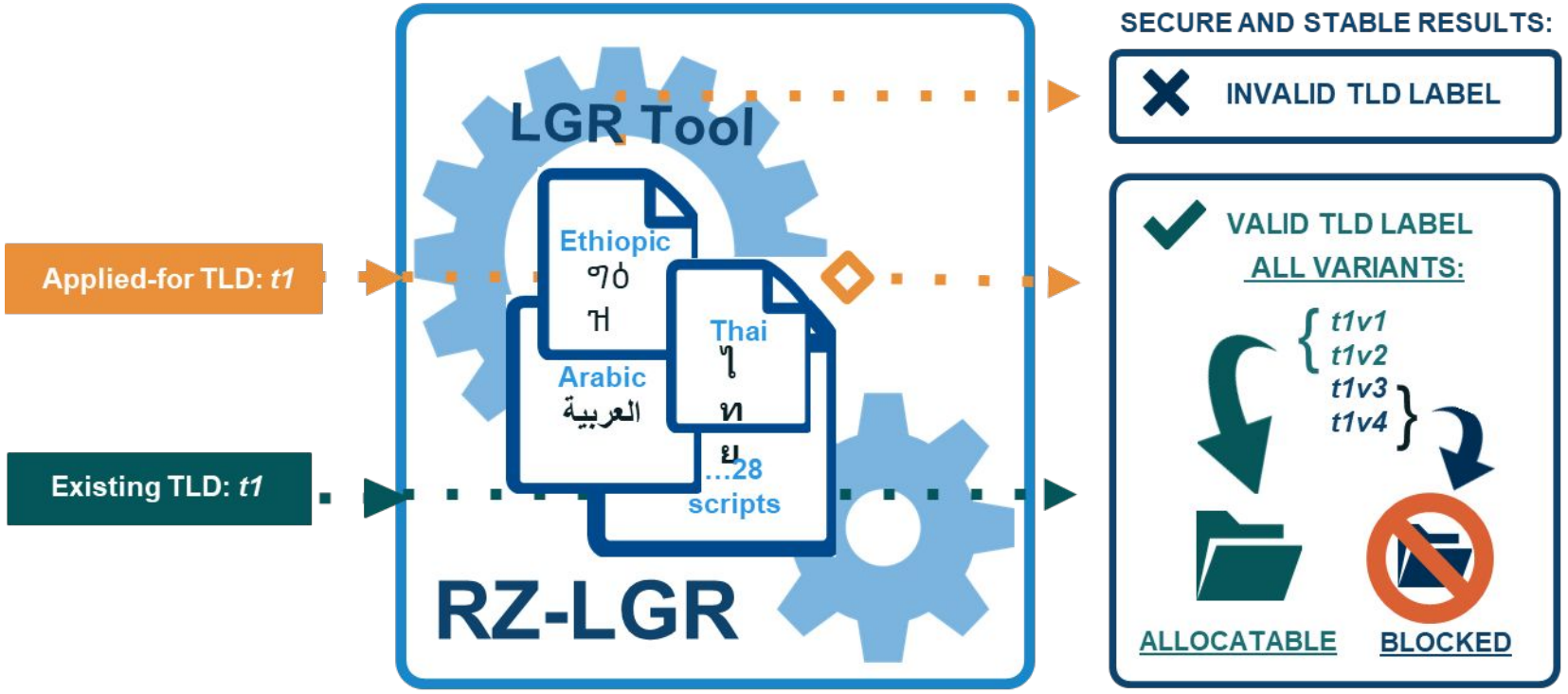
ANNEX A	String Similarity Review Hybrid Model Deliberation
ANNEX B	EPDP Team Charter
ANNEX C	Responses To Phase 1 Charter Questions
ANNEX D	Background
ANNEX E	EPDP Team Membership and Attendance
ANNEX F	Community Input
ANNEX G	New gTLD Program Process Flow Diagram

4 Underlying Principles

- **RZ-LGR as the Sole Source:** The RZ-LGR will be the sole source to determine valid top-level domain labels, their variant labels, and disposition values of the variant labels. (Subject of PR 1.1)
- **Same Entity:** At the top-level of the DNS, the same registry operator must manage the approved labels from the variant label set of a primary gTLD from the application, legal, and operational standpoints. (Subject of PR 2.1)
- **Integrity of the Set:** The relationship between a primary label and its allocatable and blocked variant labels shall not be infringed upon as long as the primary label exists.
- **Conservatism:** Adopt a more cautious approach in the gTLD policy development as a way to limit any potential security and stability risks associated with the variant label delegation.

See: Section 3: Glossary

Root Zone Label Generation Rules (RZ-LGR)



Total number of script communities (Generation Panels): 17

Total number of participant across script communities: 270+

Total number of languages represented: 386+

Total number of population represented: 5 billions

Total number of hours worked (estimated): 10,000+ hours

Total number of LGRs developed: 25

RZ-LGR as the Sole Source – PR 1.1 & PR 1.3

- **PR 1.1**: The RZ-LGR will be the sole source to determine valid top-level domain labels, their variant labels, and disposition values of the variant labels.

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	شبكھ	xn--ngbx0c15a	blocked	U+0634 U+0628 U+0643 U+06BE
4	varlabel	شبكۀ	xn--ngbx0c95a	blocked	U+0634 U+0628 U+0643 U+06C0
5	varlabel	شبكہ	xn--ngbx0cy6a	blocked	U+0634 U+0628 U+0643 U+06C1
6	varlabel	شبكۂ	xn--ngbx0c26a	blocked	U+0634 U+0628 U+0643 U+06C2
7	varlabel	شبكۃ	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	شبكھ	xn--ngbx66ayc	blocked	U+0634 U+0628 U+06A9 U+06BE
12	varlabel	شبكۀ	xn--ngbx66a6c	blocked	U+0634 U+0628 U+06A9 U+06C0
13	varlabel	شبكہ	xn--ngbx66agd	blocked	U+0634 U+0628 U+06A9 U+06C1
14	varlabel	شبكۂ	xn--ngbx66akd	blocked	U+0634 U+0628 U+06A9 U+06C2
15	varlabel	شبكۃ	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	شبكھ	xn--ngbx96asc	blocked	U+0634 U+0628 U+06AA U+06BE
20	varlabel	شبكۀ	xn--ngbx96a0c	blocked	U+0634 U+0628 U+06AA U+06C0
21	varlabel	شبكہ	xn--ngbx96a4c	blocked	U+0634 U+0628 U+06AA U+06C1
22	varlabel	شبكۂ	xn--ngbx96a8c	blocked	U+0634 U+0628 U+06AA U+06C2
23	varlabel	شبكۃ	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

- **PR 3.1**: Therefore, logically, an allocatable variant label cannot precede the primary (original) label – "*Cannot get allocatable variant unless you have primary*"

“Same Entity” & “Integrity of the Set” Principles

- **RZ-LGR as the Sole Source:** The RZ-LGR will be the sole source to determine valid top-level domain labels, their variant labels, and disposition values of the variant labels.
- **Same Entity:** At the top-level of the DNS, the same registry operator must manage the approved labels from the variant label set of a primary gTLD from the application, legal, and operational standpoints.
- **Integrity of the Set:** The relationship between a primary label and its allocatable and blocked variant labels shall not be infringed upon as long as the primary label exists.
- Principles work together:
  - RZ-LGR determine the set of variant labels which must stay together
  - Existing RO already holds primary label, so should be able to apply for allocatable variants for that primary label
- **PR 2.1**: Therefore, allocatable variant label for existing IDN gTLD from 2012 round must be only allocatable or withheld for that registry operator

Application Process & Fee-Related PRs & IGs (1/7)

- EPDP Team considered the 2012 Round application & evaluation process flow – conclusion: not feasible (operationally & cost-wise) to have a "separate round" or separate application & evaluation process for variant labels
  - Too many of the existing processes – retained by SubPro – meant that we could not disregard them for variant labels
- Therefore:
  - **PR 3.2**: Future registry operator can only apply for allocatable variant label during application round
  - **PR 3.3**: Existing IDN gTLD registry operators can only apply allocatable variant labels during application round
    - With **PR 3.15**: One-time exception in the immediate next application round, existing IDN gTLD applications for allocatable variant labels to receive priority in processing order

Application Process & Fee-Related PRs & IGs (2/7)

- **Conservatism:** Adopt a more cautious approach in the gTLD policy development as a way to limit any potential security and stability risks associated with the variant label delegation.

- Led to measures to help ensure "safety & security" for end-users:
  - **PR 3.5**: Both future IDN gTLD and existing registry operators who want allocatable variant labels must explain why they seek those variant label
    - **IG 3.6**: Criteria for evaluating explanations (per PR 3.5) should be pre-identified and applied consistently by qualified evaluators
  - **PR 3.7**: Both future IDN gTLD and existing registry operators who want allocatable variant labels must demonstrate ability to manage primary and variant labels from technical and operational perspective
    - **IG 3.8**: Evaluation (per PR 3.7) should be closely tied to overall technical capability evaluation with criteria including Critical Functions with respect to SL registrations
    - **IG 3.9**: ICANN org may do research to help identify additional standards or test for technical and operational capability evaluation (per PR 3.7)

Application Process & Fee-Related PRs & IGs (3/7)

- **PR 3.4**: Future IDN gTLD primary and allocatable variants labels in one application
- **PR 3.10**: Fee structure for all future applications must be consistent with principle of cost recovery (SubPro)
- **PR 3.11, PR 3.12, PR 3.13 & PR 3.14** all touch on application fee structure
  - PR 3.11: Future applicant for primary and up to 4 allocatable variant labels must incur base application fee.
  - PR 3.12: Any applicant applying for more than 4 allocatable variant labels may incur additional fees determined by ICANN org
  - PR 3.13: Future registry operator applying only for allocatable variant labels must incur discounted base application fee
  - PR 3.14:
    - Existing registry operator applying for up to 4 allocatable variant labels of existing IDN gTLD in the immediate next round will have base application fee waived.
    - If beyond immediate next round then must incur discounted base application fee.
    - If apply for more than 4 existing IDN gTLD in the immediate next round then may incur additional fees.
    - If beyond immediate next round then must incur discounted base application fee and may incur additional fees

?? What do all these mean for existing ROs and future applications & ROs??

Translating PR 3.11, PR 3.12, PR 3.13 & PR 3.14 (4/7)

Future IDN gTLD applicant		
What \ When	If apply in immediate next round	If apply after immediate next round
Applies for a **primary** IDN gTLD **string only**	Base application fee is incurred	Base application fee is incurred
Applies for a **primary** IDN gTLD **string and up to 4** allocatable variant labels of that string in same round	Base application fee is incurred	Base application fee is incurred
Applies for a **primary** IDN gTLD **string and more than 4** allocatable variant labels of that string in same round	Base application fee is incurred And additional fees may be incurred	Base application fee is incurred And additional fees may be incurred

Translating PR 3.11, PR 3.12, PR 3.13 & PR 3.14 (5/7)

Future registry operator	
What \ When	If apply after immediate next round
Operates a **primary** IDN gTLD and applies for **up to 4** allocatable variant labels of that gTLD in same round	Discounted base application fee is incurred
Operates a **primary** IDN gTLD and applies for **more than 4** allocatable variant labels of that gTLD in same round	Discounted base application fee is incurred And additional fees may be incurred

Translating PR 3.11, PR 3.12, PR 3.13 & PR 3.14 (6/7)

Existing registry operator from 2012 round		
What \ When	If apply in immediate next round	If apply after immediate next round
Operates an existing **primary** IDN gTLD and applies for **up to 4** allocatable variant labels of that gTLD in same round	Base application fee is waived	Discounted base application fee is incurred
Operates an existing **primary** IDN gTLD and applies for **more than 4** allocatable variant labels of that gTLD in same round	Base application fee is waived And additional fees may be incurred	Discounted base application fee is incurred And additional fees may be incurred

Application Process & Fee-Related PRs & IGs (7/7)

- **PR 3.22**: String requirements handled in application system
  - String must conform to mandatory string requirements and RZ-LGR to be submitted in application system
  - If initial algorithmic check says string is “invalid” or “blocked” application can be accepted but applicant must be warned of potential disqualification
  - If DNS Stability Panel confirms “invalid” or “blocked”, application is disqualified but applicant can invoke limited challenge mechanism (follows SubPro mechanism)
  - Grounds of challenge limited to “incorrect assessment of technical implementation of RZ-LGR”
    - **IG 3.23**: Application system should issue disqualification warning if initial algorithmic check says string is “invalid” or “blocked”
- **PR 3.24**: Disqualification remains unless and until string deemed valid and allocatable in future RZ-LGR

Reserved Names & String Ineligible for Delegation

- **Reserved Names**
  - What: ICANN, ICANN bodies/groups, or related to ICANN functions
  - Egs: ALAC, ICANN, RIPE, GAC, CCNSO, GNSO, IAB, IETF, IANA, PTI etc
  - All the RNs, except of IDN “test” strings, are ASCII strings with only blocked variant labels
  - **PR 3.18**: Reserved Names list to not be expanded to include variant labels
  - **PR 3.19**: Variant labels of Reserved Names not allowed

- **Strings ineligible for delegation**
  - What: special protections at TL & SL for names, acronyms of IGOs, INGOs with protections under treaties and statutes across multiple jurisdictions
  - Egs: Red Cross/Red Crescent Movement (RCRC); Int Olympic Comm (IOC)
  - **PR 3.20**: List of Strings Ineligible for Delegation to not be expanded to include variant labels
  - **PR 3.21**: Only the protected orgs on list of Strings Ineligible for Delegation can apply variant labels of their protected strings; but only if they also apply for or have the primary

End

Thank you for your input.