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## AT-LARGE ADVISORY COMMITTEE

### Phase 1 Initial Report on the Internationalized Domain Names EPDP (EPDP-IDNs)

#### Ratification

On 24 April 2023, the Public Comment proceeding opened for the [Phase 1 Initial Report on the Internationalized Domain Names EPDP](#). An At-Large [workspace](#) was created for the Public Comment submission. The At-Large Consolidated Policy Working Group (CPWG) decided it would be in the interest of end users to develop and submit an At-Large Advisory Committee (ALAC) statement. Satish Babu, Justine Chew, Hadia Elminiawi, and Abdulkarim Oloyede volunteered to draft the initial ALAC statement.

From 03 May through 07 June, the drafters presented to the CPWG on initial positions for the CPWG consideration and draft ALAC statement. On 21 May, the drafters began to develop the initial ALAC statement, which was posted to its workspace by the ICANN Policy team in support of the At-Large community. The recommendations and At-Large positions were discussed during prior CPWG calls. ALAC members and At-Large members via the CPWG mailing list were invited to provide input during the call and via email. On 17 June 2023, the CPWG finalized the At-Large Public Comment submission for ALAC ratification.

Per the ALAC Chair, the statement will be submitted prior to ratification given ICANN77 and the 19 June deadline. Ratification is expected to continue through Friday, 23 June 2023.

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### Executive Summary

The At-Large Advisory Committee (ALAC) appreciates the opportunity to provide its comments on the Phase 1 Initial Report of the Expedited Policy Development Process on Internationalized Domain Names (“EPDP on IDNs” or “the EPDP”) while noting that the ALAC’s appointed participants in the EPDP have been actively engaged in the work of the EPDP.

In general, the ALAC supports the preliminary recommendations and implementation guidance proposed by the EPDP in its Phase 1 Initial Report, and wishes to highlight the following specific comments of support and concerns.

The specific comments attached as a PDF also supplement the ALAC’s enclosed responses submitted via the guided template.

### Specific Comments

#### Root Zone - Label Generation Rule (RZ-LGR)

The ALAC strongly believes in the goal of making the Internet truly multilingual and universally accepted. The introduction of variant labels supports improved multilingualism of the Internet by offering to various language communities the ability to use, what are ostensibly, strings deemed as equivalent to each other, i.e. variants. The ALAC recognises that a consistent approach is needed for the management of variant gTLDs at the top-level without introducing unmitigated risks to end-users. Noting that the ICANN Board has already adopted the Subsequent Procedures PDP Recommendation 25.2 to require the use of the RZ-LGR to validate all future gTLDs and the calculation of their respective variant labels and disposition values (i.e. whether allocatable or blocked), there is no reason why there should be a different approach applied to existing IDN gTLDs. In that respect, the ALAC supports Preliminary Recommendation 1.1 in adopting the RZ-LGR as the sole source to determine the variant label set for all existing gTLDs, and the disposition values of each variant label in the variant label set. From a policy perspective, it should not matter whether those existing gTLDs were delegated in or before the 2012 round. Otherwise a gap in policy for existing gTLDs delegated before the 2012 round would arise.

#### Same-Entity Principle

The ALAC supports the concept of “Same-Entity” Principle applying to variant label sets. While the intent of Preliminary Recommendation 2.1 is explicitly called as applying to existing IDN gTLDs, it would likely be just as important to make it clear that the principle also applies to all existing gTLDs, to be complete. Again, from a policy perspective, it should not matter whether those existing gTLDs were delegated in or before the 2012 round, and we would want to avoid creating a gap in the policy *vis a vis* existing gTLDs delegated before the 2012 round.

#### Application Fee Regime for Variants

The ALAC supports Preliminary Recommendation 3.14 in recommending that existing IDN gTLD registry operators be given a waiver of the base application fee to apply for variant labels of their existing IDN gTLDs in the immediate next round of applications, noting that the existing IDN

gTLDs are the only existing ones which have allocatable variant labels based on the RZ-LGR. This preliminary recommendation recognizes that, as variants at the top-level having not been allowed in the 2012 round, there is a need for a targeted, fair remedy to address any pent-up demand for variant labels of existing IDN gTLDs since the 2012 round and one which does not cause unreasonable disadvantage against new applicants for new IDN gTLDs and their variant TLDs in future.

As a follow on, the ALAC also supports Preliminary Recommendation 3.15 in providing a one-time exception for applications, submitted in the immediate next round, by existing IDN gTLD registry operators for variant labels of their existing IDN gTLD, to receive priority in the processing order of applications.

Similarly, the ALAC recognises and supports Preliminary Recommendation 3.13 which provides for a discounted base application fee for a future registry operator wanting to apply only for allocatable variant labels of a previously secured delegated IDN gTLD as a way to discourage a rush to applying for both primary and variant labels at the same time without having time to properly plan its introduction of variant labels.

### Glossary

The ALAC appreciates and is supportive of the EPDP's effort in generating a Glossary of terms which explains their usage by the EPDP in shaping its recommendations and implementation guidance. We are comfortable with the descriptions provided, noting that the terms have been presented in a form that would enable relative novices to comprehend them, and that the full, technical definitions are linked to the term.