Overview Stress test

Version 9, 26 June 2023 Final
Further, the stress test have ben numbered through (for ease of reference).
Column: Discussed has been updated.

Eligibility of Application

Item #	Scenario	Relevant sections in document	Assessment	Adjust proposed policy?	Included in section
1.	What if the applicant/ intended IDNccTLD Manager is not member of the ccNSO, does proposed policy apply? Does IDN ccPDP policy and the delegation /transfer /revocation policy apply?	Scope of policy to be included in introduction section	Any Policy developed by the ccNSO is by definition only targeted at ICANN (see Annex C of the ICANN Bylaws). Whether an applicant / requester of the IDNccTLD is member of the ccNSO is immaterial. The applicant / requester has to meet all conditions set by the policy.	To be included in introduction of Initial report scope of policy and reference to Issue Report	Section 1.2 new

(De)-selection Criteria/ retirement related scenario's

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2.	Country name is replaced by other country name (in designated language). What if the English/French name of the country doesn't change, but the name of the country changes in the national language?	Section 1.2.1 and section 1.3.1	If the change of the name of the Territory changes in the Designated Language this is considered a change in a basic requirement for IDNccTLD. The proposed policy deals with this situation in section 1.3.1, including when such a change is considered to be a "Trigger Event".	N	NA
3.	What if an IDN ccTLD no longer qualifies as an IDN ccTLD? Is retirement needed?	Section 1.3, section 2 and Section	As a general statement it cannot be answered, but depends on circumstances. However as general principal, if after a change in circumstances the IDNccTLD no longer qualifies as such, such a change could result in a "Trigger Event". The ccPDP4 was tasked to define "Trigger Events" that could initiate the retirement process.	No	NA
4.	What if IDN ccTLD manager refuses to go through retirement process?	Retirement policy section 4.3, stress test iii Retirement policy, Section 4 FoI	The Retirement Process is considered out of scope of the IDNccPDP policy effort. The stress tests of the retirement policy address the test.	No	NA
5.	What if IDNccTLD Manager is no (longer) member of	Stress testing	The Retirement Process is	No	NAS

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	the ccNSO, do de-selection and retirement policy apply?	Retirement policy, Annex C ICANN Bylaws	considered out of scope of the IDNccPDP policy effort. The stress tests of the retirement policy address the test.		
6.	What if the IDN ccTLD that is going to be retired is widely used by another community (e.g. tech community (not necessarily local community))?	Retirement Policy section 4.3 and 4.4, Retirement stress test # ii and xii.	The Retirement Process is considered out of scope of the IDNccPDP policy effort. The stress tests of the retirement policy addresses the test.	No	NA
7.	What if the Country name as listed on standard is changed (ENG/FR)	Section 1.2.2	If a Designated Language of the Territory is not French or English, and if only the English and/or French version of the name of the Territory is changed, then such a change does not have any impact.	No	NA
7. a	Assuming the removal of an IDNccTLD string is the result of the change of the name of the territory in the Designated Language.\n\nUnder ISO3166-1 there is a standard cool down - period (or a removal of the territory from the ISO3166- 1 standard. Accordingly (section 7.6.2) *Country code elements that the ISO 3166/MA has altered or deleted should not be reassigned during a period of at least fifty years after the change. The exact period is determined in each case on the basis of the extent to which the former code element was used.*\nIs this period relevant for the re-use of the country	Principle I and Section 1.3	Support for introduction of "cooling down" period to avoid confusion.\n\nProposed start of "cooling down" period is the moment removal of the relevant IDNccTLD(s) from the root-zone file. Note that that the act of removal is the conclusion of the retirement process, but not part of it.\n\nWhat is considered a reasonable	Yes: to be included in new section (most likely in Miscellaneous (section 9) or Applicability of policies	Section New 1.2.1

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	name as an INDccTLD? Or its variants?		period will be determined in new ccPDP. In first reading the suggestions varied from 10-30 years (not considering the duration of the retirement procedure). In second reading the agreed upon minimum period is 10 years. Although a request for re-use may be very unlikely (taking into account that the selected string has to be a meaningful representation of the name of the Territory) a cooling down is believed to be warranted to avoid overlap with cached entries with a very high TTL's, other potential issues, and other uses.		
7.b	Assume an IDNccTLD is removed from the root-zone file. Who determines the IDNccTLD can be re-used again? ICANN, ccNSO, external organization? For Country Code elements to be assigned by the ISO 3166/MA, a code will be re-assigned by the ISO 3166/MA.	Not addressed Basic Principle RFC 1591: IANA (read ICANN) is not in the	In first reading various mechanisms were initially discussed: - Appoint external panel to determine re-use - Leave it to ICANN - Start a ccNSO PDP after	Yes	Section 1.2.1

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		business to determine what is and what is not a country.	retirement of one or more IDN ccTLDs has been completed (ccNSO is policy making body) Discussion ended in agreement that ccNSO should launch a ccPDP after removal of the IDNccTLD string(s) from the Root Zone flle, taking into account the 10 year suggested "cooling down" period of 10 years. Factors to consider in ccPDP to determine in the "cooling down" period before possible re-use are: - Use of the IDNccTLD before retiement - Cause of retirement - Possible re-use of the IDNccTLD string - Mechanism to allow re-use		
8.	What if a selected IDN ccTLD string and all its variants are retired and someone else applies for the retired label. What happens?	Principle IV, Section 1.2	If all criteria are met, including but not limited to the requirements that the new to be requested selected IDNccTLD string is a meaningful representation of the name of Territory etc., then nothing withstands such a new request.	No	NA

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			However, the cooling down period and the newly to be developed policy will determine when and how the retired string(s) can be applied for (again)		
9.	What if a ccTLD Manager wishes to retire the selected IDNccTLD strings (due to natural reasons, such as removal of support of the script on the governmental level), and the ccTLD IDN to be retired is the selected (primary) IDNccTLD?	Section 1.3, see also other more specific tests for example # 1, 6, 10 and 11	If the selected string is to be retired, all delegated variants should follow. By definition variants are derived from and are considered related to the selected IDN ccTLD sting. Hence, the variants follow the fate of the defining IDNccTLD string.	Include a general statement, that if a selected cctld string is retired, all degetable variants which have been delegated, follow the fate of the selected IDNccTLD string. There should be no confusion as to whether the delegatable variants can remain in the root zone. In addition all non-delegated delegatable variants shall be non-eligible as IDNccTLD for this Territory .	Included in Section New1.2.
~~9.~~	~~What if two countries are merged, like Eastern and Western Germany,~~	~~Principle I~~	~~This test is subsumed in test 16.~~		No longer a scenario

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	i. what if they used the same IDNs Scripts? ii. What if they would use different scripts iii. What if Eastern Germany had an IDN ccTLD that was retired?				subsumed in #16
10.	What if the script of the local language changes and the country has decided to change the script it uses?	Section 1.3.2 & section 1.3.3	This situation is covered in section 1.3.2 and 1.3.3. In principle a change of the Designated Language and change of the script in which the Designated Language is expressed could initiate the procedure ending in a "Trigger Event".	N	NA
11.	What if a territory script and language match, but a significantly interested party withdraws from the existing script and would like to propose a new script. Would the Deselection process be triggered?	Section 1.2.2, 1.2.3 Section 1.2.7 and section 2.2 & 2.3	Whether a significant interested party supports or does not support the script is irrelevant. The SIP is only expected to support the selected string. Note that the for the term Designated Language in other contexts the term "Official Language" is used. To be considered "Designated" under the policy the Language should meet one of the criteria listed in section 1.2.2.	N	NA
12.	What if a country name is changed and the script and language remains the same, however the relevant people would like to retain the same name	Section 1.3 & Section 2.1, 2.2 and 2.3	If the country name is changed, and after this change the initial selected IND ccTLD is no longer a	N	NA

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	as they had before the same?		meaningful representation of the name of the country in the designated language, the selected string no longer meets the criteria. In principle this could end up in a "trigger event", However according to section 1.3.1, ICANN is not expected to monitor actively, but as soon as changes are needed the procedure leading to the "Trigger Event" will start.		
13.	Country split from AA to AA and A'A' . The ISO3166-1 two (2) letter code AA remains for one country. The split results in assigning different ISO3166-1 code A'A' to other part. Before the split (A'A')IDN ccTLDs was related to AA and will be kept, including the variant(s), subject to local decision only. This will 'block' the names for the split off Territory A'A'. Is there a way for A'A' to trigger deselection of (A'A') IDNccTLD? And if so can (A'A') request (A'A') IDNccTLD	Section 1.2.1 & 1.3.1	According to scenario A'A'IDNccTLD was delegated and hence a meaningful representation of country AA. The split of AA into AA and A'A' does not change that A'A'IDNccTLD is still a meaningful representation of AA in the Designated Language and related script. As a result A'A'IDN ccTLD still meets all the criteria, including the meaningful criteria even if SIP of A'A' would like to see it differently.	N	NA
14.	What if the script of the local language changes and the country has decided to change the script it uses?	Section 1.3.2 an d section	The IDN ccTLD does not meet all the criteria and the procedure of	N	

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		1.3.3	section 1.3.3 applies.		
15 (was 16.)	'Merger' scenario – The ASCII for West Gebied is .WG, and the abbreviated name is Gebied. West Gebied merges with South Gebied. For this South Gebied the ccTLD .SG was delegated. Under this test only South Gebied uses an IDN ccTLD in the Dutch language **.GEBIED**. After the merger .ST will be retired in accordance with the ccTLD retirement policy. What will happen with the IDNccTLD **.GEBIED**?	Principle I	The basic principle of the proposed policy is that if the reference to a **Territory** is removed from the ISO3166 – 1 standard because two or more Territories have merged, this removal is considered a "trigger event" . This will cause the initiation of the process for the retirement of **all the selected IDNccTLD(s) (and their variants),** which are a meaningful representation of the name of the **Territory**. However, if GEBIED is a meaningful representation in the Designated language of the merged Territory, and the Significantly Interested Parties of the "merged" Territory support the IDNccTLD, it should not be retired. Note that the basic criteria only one (1) IDN ccTLD string per Designated Language applies (section 1.3.2). So if there is already a IDNccTLD for the merged territory in the same Designated Language, GEBIED shall need to be retired.	Y, adjust Principle I and possibly section 2.2 and 2.3 applies	Section O principle I

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Variant and variant management test

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17	EPDP scenario. An IDN ccTLD seeks supports for variant set, along the way something happens with selected string, primary (i.e selected string) is no longer eligible.	Section 3.2.1 See stress # 8 Criteria (above)	If a selected IDNccTLD does not meet any of the criteria (hereafter is "not valid" or "invalid"), variants are not be calculated anymore. Note there is no general statement that if a selected string does not meet all requirements, the variants are considered not valid anymore. The CS sub-group agreed to the following: If the selected string is not valid, all related variant strings are invalid. Rationale: The selected string is considered the core or primary string. All delegatable variants strings are derived from this string through the RZ-LGR. So if the core or primary string is considered invalid, all strings that are derived from the this core or primary string should be invalid as well. And from the related Notes and Observations *It is noted that if the selected string is not valid, but a delegatable variant IDNccTLD string is valid, this string could be considered the selected IDNccTLD string, and pass. To avoid unnecessary administrative burden by renewed submission, which is always possible, ICANN is advised to accept a note confirmation that one of the delegatable IDNccTLD strings that is valid, is deemed to be the*	Confirmed in first reading that only if selected string meets all criteria the variant set is valid. This recommendation needs to made general	See section 1 new

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			selected IDNccTLD string. The note of confirmation shall need to be supported by the Significantly Interested Parties that support the original request.		
18.	What if IDNccTLD Manager applies for a Variant string that is not in official language of country. The IDN ccTLD managers wants to serve non-official language users. Limitation of usability by limitation of criteria?	Section 3.2.3, Annex C ICANN Bylaws	According to the proposed policy 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. The national consideration which community is to be served, and hence the registration policy is out of scope of this and other ccNSO PDPs	No	NA
19	Asymmetrical variants. Sometimes variants are asymmetrical: if you go from label A to label B, label B is allocatable, however sometimes going form Label B to label A it is blocked. How will this play out under the policy?	Section 3.2.1& section 3.2.3	Variants are derived from the selected IDNccTLD string through the RZ-LGR. Assuming string A is the selected IDNccTLD string and string B an allocatable variant of A, then string B could be a delegatable variant of the selected IDNccTLD A if all criteria are met. However, assuming asymmetry, and string B is the selected string and string A is blocked variant of string B, then by definition variant IDNccTLD string A is non-eligible.	No	NA
20.	IDN1 is the selected IDNccTLD string in Chinese, and IDN2 and IDN3 are variants under Chinese RZ-LGR. IDN3 is a variant in Japanese. Is IDN3 in Japanese eligible?	Section 3.2.3, 3.3	Only Allocatable VARIANTS of the selected IDNccTLD string that are Meaningful Representations of the name of the Territory in the Designated Language are eligible.	No	NA

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			Therefore, if IDN3 is a meaningful representation in another Designated Language it may be requested.		
New 20 a.	IDN1 is selected IDNccTLD string in Chinese, and IDN2 is allocatable variant and IDN3 is a blocked variant under Chinese RZ-LGR. Someone applies for a string IDN3" in Japanese that looks similar to IDN3. Is the string IDN3" eligible?				See item 33
New 20 b.	IDN1 is the selected IDNccTLD string in Chinese, and IDN2 and IDN3 are allocatable variants under Chinese RZ-LGR. IDN3 is also meaningful representation in Japanese. Japanese is also a Designated Language of the country. Another applicant applies for IDN3.		Although IDN3 is a meaningful representation in another Designated Language, it is also a variant of the already delegated string IDN1. IDN3 can only be requested by the requestor of IDN1.	N	NA
21.	Assume asymmetrical variants: A-> B allocatable, B-> A is blocked as a result of the RZ-LGR. What if an applicant has applied for A first and then applies for B? What if an applicant has applied for B first, before RZ-LGR became effective, and then wants both (B and A)?	Principle IV, Section 3.2.1 & 3.2.2,	Before RZ-LGR became effective the applicant could not request any variants. Only after a script has been integrated into the RZ-LGR variants can be calculated and hence applied for. Note that the according to Principle IV the request for (and delegation) of IDNccTLDs, is an ongoing process. It is implied in the Fast Track Process Implementation Plan (FIP) (section 3.4) and section 3.2.2 of this proposed policy that variants can be requested after the selected string was delegated	N, However make explicit in policy that at the time of application the rules at the time the application is submitted.	See section 3.5 New

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			(including Delegatable variants of IDNccTLD strings that were delegated under the Fast Track Process).		
			However, as implied in section 3.4 of the FIP, and 3.2.2, that a variant is only valid if at the time of application it is valid according to the RZ-LGR.		
			If according to the RZ-LGR at the time of submission of the application of IDN ccTLD B this variant is an allocatable variant of A, B is "valid" and assuming all other criteria are met, then B is eligible.		
			If according to the RZ-LGR at the time of submission of the application of IDN ccTLD A this variant is a blocked variant of B, then A is "not valid" and therefore not eligible.		
			Finally, it is noted that there is an expectation that the requester and relevant community using the script in which the IDN ccTLD string is expressed, will have participated in the related script generation panel. This would have allowed the requester and Significantly Interested Parties to build an alternative case with respect to strings A and B .		
21 a	Same scenario as under 21, but with expectation that at the time of application and delegation of the selected IDNccTLD string, the variant would become available		At the time of application under the Fast Track variants were not available, however one could express an interest in a desired variant. At the same time it was made clear that ultimately the rules at	See Item 21	

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	i.e. the variant would be "valid" under RZ-LGR?		the time of application of the variant of the selected string determine whether a string is valid. Under this scenario, whether or not there was an expectation that a variant would be "valid" is not relevant. Only relevant is the set of rules that is effective (including the RZ-LGR) at the time of application of a specific string, whether a selected IDNccTLD or Delegatable variant of the selected string.		
22.	The application of RZ-LGR makes the currently delegated ccTLDs become variant of each other. How will this play out?	Section 3.2.4, Section 9C	To date (March 2023), IDNccTLD are selected and delegated without applying the RZ-LGR. According to the proposed policy under section 9 C each of the currently delegated IDNccTLDs are grandfathered, irrespective of whether they are considered variants through the RZ-LGR. In the event a change in RZ-LGR causes a "collision" between ccTLDs, it is expected that this is pointed out to the generation panel. The generation panel is expected to share the motivation of still doing that change, to ensure all are informed. See https://www.icann.org/en/system/files/files/rz-lgr-technical-utilization-recs-07oct19-en.pdf Recommendation 12.	N	NA
23.	String A has allocatable variants: A1, A2. But A1 -> A2 blocked variant and A2 -> A1 blocked variant.	Section 3.2.1& 3.2.2 and 4.2.2	According to section 3.2.1 and 3.2.2 Variants of the selected sting are derived from and directly related to the selected IDNccTLD through the RZ-LGR, in other words, if no selected IDNccTLD then no	To be made explicit in the policy?	See section 3.4 New

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	A, A1, A2 have all been delegated What happens if A is deselected?

Can A1 and A2 remain delegated, even if they wouldn't be allowed to co-exist without the initial label A? | | variants.

As a result, the de-selection of selected string A shall result in de-selection of variant strings A1 and A2.

The proposal do provide for specific situation that although A is deselected, A1 may continue (see section on deselection by SIP). However, in such a case A2 also has to be retired as it is a blocked variant of A1. | | |
| 24. | Is there a need to synchronize between ccPDP4 and EPDP sets of recommendation when blocked IDN strings are involved. because in the end it is going to be in IANA for the IDN variants.

Assume a particular IDN string is applied for without variant, does the applicant has the right to register/ claim and refer to all the variants of the selected IDNccTLD string at a later stage? | Principle IV and V, Section 1.2.3 and 3.2.3 | In principle (Principle IV) the IDNccTLD selection process is open, implying there is no time limit for selection of a string in a territory and request for a IDNccTLD string or its delegatable variant.

Further, according to Principle V, criteria determine the number of IDNccTLD per territory, including the number of variants to be delegated.

In addition, the number INDccTLDs strings is limited to one IDNccTLD per Territory, with the exception of delegatable variants. If a Delegatable variant meets all the criteria (other than one string per Territory).

As re-stated in section 3.2.3 only allocatable variants of the selected IDNccTLD that are a meaningful representation of the name of the | Suggestion is no change | Update of Principle IV |

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			country are eligible. According to the notes and observations of section 3.2.2: *For variants to be eligible for delegation, section 3.2.3 implies that all criteria apply and the required documentation and support from the Significantly Interested Parties must be available for all requested variants before validation.* Section 3.2.3 also implies that if - for example – a Delegatable variant of a selected string is considered confusingly similar to an already delegated IDNccTLD or gTLD and not associated with the same territory, it is not valid. Therefore a right to all variants cannot be assumed.		
25	How does an IDN ccTLD Manager of an already selected and delegated IDNccTLD string apply for a delegatable variant TLD - is it the same process given the primary string is already delegated?	Principle IV Section 3.2.2 and Section 5.2	According to Principle IV the request for (and delegation) of IDNccTLDs is an ongoing process. It is implied in section 3.2.2 that variants can be requested after the selected string was delegated (at least variants from IDNccTLD strings that were delegated under the Fast Track Process. All requests have to follow the same validation process as defined through section 5.2 the String Validation stage. If as suggested letters of support are from different entities, this should be clarified by the applicant. Under the Fast Track Process, ICANN and PTI have acquired a lot of experience with these type of situations. It is therefore considered a matter of implementation (as under the Fast Track) so called	Make explicit that Delegatable variants can always be requested. This is implication of Principle IV and implied in section 3.2.2 transitional arrangement. However, the validation procedures also apply to request of Delegatable	Principl,e IV has been updated

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			conflict of forms	variants of the selected IDNccTLD string.	
26.	What if a Delegatable variant of the selected IDNccTLD string is delegated before the Selected IDNccTLD is delegated?	Principle IV, Section 3.2.3	The Notes and Observations of Section 3.2.3 imply that all criteria apply and the required documentation and support from the Significantly Interested Parties must be available for all requested variants before validation and delegation. As the ccNSO process is an open process, both in terms of requesting a an IDNccTLD string as in terms of requesting delegation of IDNccTLD strings, and all the requested strings meet all criteria, the order of delegation and delegation requests is not relevant	N	NA
27.	Assume IDN 1 is delegated. Manager IDN 1 applies for variant IDN 2. IDN2 is variant of IDN 1. Will IDN2 be eligible for delegation and can it be delegated?	Principle IV, Section 1.2.3,	The IDNccTLD process is open (see Principle IV), meaning IDNccTLD strings and their delegation can be requested any time. It is not explicitly stated that Delegatable variants can be requested any time independent, but after the request of the selected IDNccTLD string. However, note that IDN2 can only be delegated to the same ccTLD Manager.	Update the document to make explicit that Delegatable variants can be requested at the time or after the request for the selected IDNccTLD string has been submitted	Principle IV has been updated
28	Assume that as the result of an needed amendment of the RZ-LGR, an IDNccTLD	Section 3.2.4 Impact of	According to section 3.2.4 the basic rule is that he IDNccTLD should be grandfathered when the RZ-	Adjust the proposal. The	Update section

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	string causes a demonstrably threat to the DNS and the IDNccTLD should be retired. The retirement of a ccTLD (including IDNccTLD) takes at least 5 years as of the Notice of Retirement). Given this duration of the retirement should the change to the RZ-LGR become before the retirement is effective? Should the IDNccTLD be grandfathered during this period?	possible amendment of RZ-LGR. Retirement policy.	LGR is amended. Only when as a result of the change of the RZ-LGR it is demonstrated that the stability and security of the DNS is demonstrably threatened and deselection the only demonstrably measure to mitigate such a threat, such an IDNccTLD should be deselected. Note that according to the GNSO IDN EPDP, all strings should be grandfathered. However, also note that the de-selection decision only demarcates the start of the retirement process of the IDNccTLD. This process itself will take at least 5 years, and is not governed by this policy but by the retirement policy. As a result the threat to the DNS will remain during this period of retirement and prior to the removal for the DNS Root zone file. In addition, changes to the RZ-LGR take into account external influences and only become effective after an extensive public consultation. This public consultation provides opportunities to the community to advise of the potential threat caused by the proposed change of the RZ-LGR.	delegated IDNccTLD string and its delegated variants should be grandfathered. Aligns with GNSO IDN EPDP	3.2.4
29	An applicant, request a single character IDNccTLD, which meets all criteria (Meaningful, Designated Language, supported by SIP, etc.). Is string eligible under the policy?	Section 1, 2 and 4	If a string meets all criteria, nothing prevents it from being requested. However note the criteria of only one IDNccTLD string per Designated Language apply.	Include statement in policy that Single character IDN ccTLD strings are not eligible.	See section 1.1.

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			However note SAC 052 (2012) : https://www.icann.org/en/system/files/files/sac-052-en.pdf In SAC 052 two potential issues were identified: • Single Character TLDs are more likely to cause user confusion than TLDs with more characters • Work on user confusion/string similarity and IDN variants needs to be completed, Currently, the work on confusion/ string similarity is not completed nor will it be completed in foreseeable future. Therefore the concerns raised in SAC052 are still relevant. Taking into account the need to ensure the security and stability of the DNS, the application for Single character IDNs under this proposed policy is currently deferred.	However also note this statement should be revisited as part of the first review of the policy.	

Confusing Similarity Tests

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30	New manager applies for a CS of incumbent's non-delegated but allocatable variant. What options are open for incumbent, what is impact of CS		The application of the new manager will go through the string validation process, including the CS evaluation. If the String Evaluation Panel finds the string confusingly similar with the already delegated string, a delegatable or other variant of the already delegated string, the requested string is not eligible. If it is not found to be confusingly similar, the string is considered valid. The incumbent has no options to object and or participate, which is in line with the basic principle around sovereignty of ccTLDs	N	NA
31	Applicant applies for IDN 1 (the selected IDNccTLD string) and delegatable variant IDN2. IDN 3 is a blocked variant of the selected string IDN1. IDN 1 and IDN 2 are not Confusingly Similar to other strings. Assume IDN 3 is Confusingly Similar with an already delegated IDN TLD, how will this play out?	Section 4.2.3	According to the proposed policy the requested IDNccTLD string and its delegatable variants will be in included in the Request Side of the Base for Comparison (Section 4.2.3 A) and validated on CS against the strings/labels included in the Comparison Side (Section 4.2.3 B). By definition IDN3 (the blocked variant) cannot be requested and is not included in the Request Side. Therefore no consequences.	N	NA

32	The base for comparison under the ccPDP4 proposals (section 4.2.3) includes the selected string and delegatable variants at the Request side. On the Comparison Side they include both delegated and applied gTLD and ccTLDs and their variants. However, how will comparison between a ccTLD string and a gTLD label play out, given that delegatable variants of gTLDs are not defined, but only allocatable or blocked variants?	Section 4.2.3	Note that currently the proposed Comparison Side (section 4.2.3 B) of the Base for Comparison includes primary delegated IDNccTLD and gTLD delegatable IDNccTLDs variants, and TLDs in application process and secondary include allocatable and blocked variants of TLDs. Therefore, one may expect that if there is a need to evaluate IDNccTLD string(s) with gTLDs, at a minimum allocatable variants derived from gTLDs already delegated or in process are included in the base of comparison.	N	
33	IDN1 is selected IDNccTLD string in Chinese and delegated, and IDN2 is a delegatable variant and IDN3 is a blocked variant under Chinese RZ-LGR. Someone applies for a string IDN3" in Japanese that looks similar to IDN3, but is NOT a variant. Is the string IDN3" eligible?	Section 4.2.3	IDN3" is by definition included in the Request Side (4.2.3 A) of the Base for Comparison for the CS validation. IDN1 and IDN2 will by definition be included in the Comparison Side (4.2.3. B) of the Base for comparison, Secondary IDN3 is expected to be included in the Comparison Side, and in all cases the Similarity Evaluation Panel needs to provide a rationale on the in- or exclusion of the blocked variant IDN3 in the Comparison Side. Assuming IND3" is confusingly similar with IDN3, it is not valid.	N	NA