

## ALAC Response to VIP Integrated Report – DRAFT

The ALAC applauds the substantive work produced by the IDN VIP (Variant Issues Project) team in producing the draft Integrated Issues Report and welcomes the publishing of the draft for public comments.

The ALAC reiterates its continued recognition of the significance and importance of IDNs, including IDN TLDs, for ICANN in enhancing diversity and embracing multilingualism on the Internet. More importantly, the proper and prompt implementation of IDN, including IDN Variants, that respect the cultural requirements and the long standing work from many of the IDN communities around the world.

In response specifically to the draft Integrated Issues Report:

1. The ALAC observes that much of the issues identified are issues that seem to have been understood and previously brought up by the community already. In other words, “nothing new” seems to have been uncovered. Given such discovery, the ALAC advises ICANN to avoid further delays in moving forward towards the implementation of IDN Variants at the root;
2. Nevertheless, the ALAC also observes that while the study teams spanned a variety of languages and scripts, many other languages and writing systems have not been included. The ALAC further advises that ICANN set aside resources to continue to coordinate and support IDN registration policy development, especially those relevant to IDN Variants and for implementation at the root as a shared global public resource;
3. The ALAC commends the comprehensive integrated framework and categorizations identified by the VIP team. As expressed in our comments submitted previously, the ALAC continues to observe the disparity between the policy and operational readiness of implementation, including the level of consensus between the different language communities. Given the importance of IDN Variants, the ALAC advises that as solutions and implementation recommendations are being completed, that the possibility of implementing IDN Variants for language communities that are more ready first should be considered. The impact of such deployment should be studied, but most importantly priority should be given to avoid disadvantaging language communities that have implementable policies available; and,
4. In consideration of possible implementation approaches/directions identified in the draft Integrated Issues Report, the ALAC advises that where evaluation panels or committees are employed, that the transparency of the work of such panels be maintained as much as possible, and to ensure that appropriate language community expert representation be included to avoid an overly ASCII-bias of the individuals constituting such panels and committees. Especially given the experience observed at the IDN ccTLD Fast Track.