

Proposed Draft by Rinalia Abdul Rahim / 11 April 2012 (following IDN-WG call and webinar)

[Draft] ALAC Response to the VIP Proposed Project Plan for Next Steps

Acknowledgment of VIP Team Achievement

The ALAC congratulates the IDN VIP team upon the successful completion of the case study reports and the final integrated report. We also wish to record our appreciation for the outreach efforts of the VIP Team aimed at enhancing the community's understanding about the outcome of its work to date as well as the thinking/framework that guided its work and the processes entailed.

Significance of IDNs and Implications on Future Work of the VIP Team

The ALAC reiterates its continued recognition of the significance and importance of IDNs, including IDN TLDs in enhancing diversity and embracing multilingualism on the Internet. We believe that every culture and every language is unique and that the implementation of IDN and IDN Variants would serve to make the Internet more inclusive and representative of the world that we live in.

Given the importance of the work, the ALAC calls on the VIP Team to ensure that the conduct of its future work is accountable, transparent and does not duplicate work that has or is being done within or without the ICANN community. Towards this end, we urge the VIP Team to continuously inform the community on its work and progress, and to draw synergies wherever possible by leveraging on the work and expertise of the wider Internet community.

The ALAC is pleased with the VIP Team's interest in engaging the wider Internet community, which the Team expressed during the ICANN meeting Costa Rica in March 2012. In doing so, We request that the VIP Team maintain a high level of transparency and clarify the project basis for engaging consultants vs. community volunteers vs. ICANN staff.

Comments on the Internationalized Domain Names (IDN) Variant Issues Project (VIP) Proposed Project Plan

Approach

The approach taken by the VIP Team is a standardized, universal and comprehensive one, which has merit in that it takes into consideration aspects of fairness and security. The approach hinges crucially upon the expectation that it is possible to develop a comprehensive code-point repertoire and label generation rule-set within a specific time-frame. The VIP Team has been careful to clarify to the ALAC during a Webinar on 11 April 2012 that until the code-point repertoire and label-generation rule-set are complete, the implementation of any IDN Variant would not be considered regardless of the level of community readiness.

The ALAC concern regarding the VIP Team's approach is as follows:

1. The standardized is contrary to the community consensus on appropriate approaches to the IDN Variant issues, which are highly diverse. A standardized approach also discriminates against communities who consider themselves ready to implement IDN Variants.
2. Assuming that it is possible to develop a comprehensive code-point repertoire and label generation rule-set within the period specified in the proposed project plan, the VIP Team will only

be ready to work with communities who can demonstrate that they are ready to implement IDN Variants by the middle of Fiscal Year 2013.

3. The process, timing and criteria for communities to demonstrate their readiness to implement IDN variants are not addressed. This set of information would serve as an invaluable guide for communities regardless of whether they are early entrants or late entrants to IDN Variant implementation.

The ALAC recommends the following:

1. Adopt an inclusive multi-stakeholder bottom-up approach to code-point repertoire development that is consistent with the ICANN IDN Guidelines and relies on the community consensus in identifying and determining code-points by language/script or groups of languages/scripts.
2. Develop a framework based on the findings of the integrated report that would serve as a checklist/guide for language communities to develop their IDN Variant TLD policy and or implementation plan. Such a checklist would include aspects that include code-point repertoire, code-point overlap, label generation rule-set, types and states of variants, etc.
3. Clarify the process, timing and criteria for engaging with communities who consider themselves ready to implement IDN Variants. In addition engage the ICANN channels for reaching out to various language communities to raise their awareness of these considerations.

Cost

The ALAC would appreciate an elaboration on the financial basis of the proposed project.

Risk

The ALAC understands and appreciates that security risk considerations are paramount. The introduction of new technological advancement however, requires balancing risk considerations with benefits to be derived. The demand for IDN Variants and the findings of the VIP case study reports indicate that the benefits of implementing IDN Variant TLDs out-weigh the risks.

Way Forward

Given that the technical community, including the IETF and the IAB, has iterated that the issue of IDN Variants cannot be solved with a technical solution based on current DNS standards, the ALAC agrees with the view that, in the immediate term, the implementation of IDN Variant TLDs should be focused on:

1. The engagement of communities in developing code-point repertoire and label generation rule-set.
2. The development of a process, time-line and criteria for working with communities who are ready to implement IDN Variants.
3. The development of a framework that guides language communities in developing their IDN Variant policy and implementation plan.