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STATUS: Pending Ratification

AT-LARGE ADVISORY COMMITTEE Phase 2 Initial Report of the EPDP on Internationalized Domain Names

The ALAC appreciates the opportunity to comment on the Phase 2 Initial Report of the EPDP on IDNs. The ALAC notes that this was a significant effort by the EPDP Team considering the size and complexity of the Charter Questions, and commends the efforts of the EPDP Team in completing the work ahead of the initial estimated timeline.

The ALAC supports all twenty Preliminary Recommendations and Implementation Guidelines in the report. The ALAC believes that these will enable the availability of IDN variant domain names under any to-be-introduced IDN gTLDs, while ensuring the security and stability of the DNS, minimizing user confusion, and ensuring that the relevant standards and guidelines, such as IDNA2008 and the IDN Implementation Guidelines (currently in the version 4.1), are followed.

The ALAC suggests four text improvement opportunities and also would like to mention three cases where the EPDP Team has not made any recommendations, but where the ALAC suggests guidance is appropriate.

Text Improvement Suggestions

1. In the Glossary as well as Page 60 of the report, the expansion of ROID is specified as Registry Object Identifier. However, this is Repository Object Identifier in ICANN Documentation (for instance, in the Appendix B of the Recommendations for Managing IDN Variant Top-Level Domains¹).
2. In Implementation Guidance 7, there is a sentence that states “This should include respecting IDNA2008, IDN Implementation Guidelines, and any future versions of these two documents.” It may be better to use “standards” or “guidelines” instead of “documents”.
3. In Preliminary Recommendation 6 as well as in Implementation Guidance 7, there is mention of “...should collaborate to develop minimum IDN variant deployment

¹ Available at <https://www.icann.org/en/system/files/files/idn-variant-tld-appendices-25jan19-en.pdf>

requirements (i.e., variant sets).”, we think the phrase “variant sets” appears to be inconsistent with the rest of the text and intention of that implementation guidance, and can perhaps be deleted.

4. There is inconsistency in the language used in Preliminary Recommendation 6 (PR6) and Implementation Guidance 7 (IG7) where the relevant stakeholders are listed. PR6 states “Registry operators, ICANN org and other relevant stakeholders must develop minimum IDN variant deployment requirements...”, while in IG7, this is “ICANN org, gTLD registries, and other relevant stakeholders should collaborate to develop minimum IDN variant deployment requirements”, specifically leaving out ccTLDs. For the sake of consistency, and also noting the ICANN Board’s urging for GNSO and ccNSO to remain synchronized on IDN policy, the ALAC suggests that IG7 also specifies “Registry operators, ICANN org and other relevant stakeholders”.

Guidance for CQs that have no recommendations

Further, the ALAC expresses concern on three Charter Questions (CQs) that the EPDP Team did not provide recommendations for, as these impact end-users.

1. CQs C3 and C3a are about how to uniquely identify a registrant so as to be able to implement the “Same Entity” principle. While the EPDP Team agreed on the need for such identification, it has not made any recommendation or implementation guidance on how or when to meet this need. The ALAC would like to point out that a coordinated approach in identifying an appropriate mechanism, together with an indicative timeline on how and when this is to be done, in the form of an implementation guidance, would be beneficial for all relevant stakeholders, and would facilitate the goal of minimizing the risk of confusability for end-users. Such guidance does not have to apply immediately, but in a reasonable time frame. While the ALAC understands the concerns of Registries and the need for flexibility on this matter, we also believe that such lack of guidance would be ultimately detrimental for all stakeholders.
2. Preliminary Recommendation 5 mandates that all IDN Tables used must be harmonized. CQ C6 asks if the IDN table should be formatted in a machine-readable manner (RFC 7940, which is XML-based) as recommended in the Staff Paper. During discussions, the ALAC team had expressed the opinion that a standards-based approach that is machine-readable would be forward looking. The ALAC understands the effort, time and funding that registries would require for this transition, and did support the stand not to insist on an immediate plan to transition. However, the ALAC still feels that there is a need for guidance that Registries should be shepherded into transitioning to a standards-driven approach in a reasonable timeframe, rather than be left to depend on multiple approaches. Such a transition would make the IDN variant system more resilient and improve manageability in establishing consistency for IDN Tables across TLDs and

across registry operators which is a key goal of harmonization. Consistent representation of IDNs across different platforms reduces confusion and improves user experience.

3. CQ D5 asks the question that, for reporting and fee purposes, whether the variant domain set should be treated as a single registration. During the EPDP Team deliberations, there was considerable support for treating the entire variant domain set as a single registration. However, no recommendation was developed on CQ D5, "...in order not to impinge on the existing rights of registry operators in accordance with their policies and contractual agreements with sponsoring registrars"². From an end-user perspective, the ALAC feels that a single registration is more desirable, and that this should be provided for not only from a cost perspective, but also in terms of the ease of operations such as registration, renewal and transfer. Given that a variant domain name set, with variants at the top and second levels, can be large, separate registrations for each domain name would mean that each of the above operations will need to be done multiple times. Therefore, the ALAC suggests that the EPDP Team provide guidance along the lines of "Unless there are significant contractual restrictions, the entire variant domain set should be treated as a single registration through the EPP Update mechanism".

Ratification Record

On 11 April 2024, the Public Comment proceeding opened for the Phase 2 Initial Report of the EPDP on Internationalized Domain Names. On 12 April 2024, an At-Large [workspace](#) was created for their 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 ALAC statement for this Public Comment proceeding. Satish Babu, Hadia Elminiawi, Justine Chew, and Abdulkarim Oloyede volunteered to draft the ALAC statement.

On 7 May 2024, Satish Babu submitted initial comments for the ALAC statement. On 15 May 2024, Satish Babu, Hadia Elminiawi, Justine Chew, and Abdulkarim Oloyede finalized the At-Large Public Comment Statement. The ALAC Chair, Jonathan Zuck, requested that the ALAC ratify the Public Comment Statement before submission to the ICANN Public Comment feature.

On [20 May 2024], staff confirmed the online vote resulted in the ALAC endorsing the statement with [x] out of 15 votes in favor. [x] votes against, and [x] abstentions. Please note 100% of ALAC members participated in the poll. The ALAC members who participated in the poll are (alphabetical order by first name): [ALAC Members] You may view the results here:

² From Page 65 of the report