

Expedited Policy Development Process on Internationalized Domain Names

EPDP-IDNs Team Working Session
Monday, 10 June, 2024 at 13:45 CAT

Agenda

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Roll Call and SOI Updates

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Welcome and Chair Updates

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Overview of Phase 2 Initial Report
Public Comment

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Start Review of Phase 2
Initial Report Public Comment

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Next Steps

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AOB

3. Overview of Phase 2 Initial Report Public Comment

Categorization of Public Comment Input

Guided Submission Form

- Input was requested through a guided submission form to link comments to specific sections / Outputs
- The comments were categorized as “Substantive” OR “Non-substantive”

Substantive

- Significant change required: changing intent and wording
- Do NOT support Recommendation

Non-Substantive

- Support Recommendation as written
- Support Recommendation intent with wording change
- No opinion

Submissions are organized through a [Public Comment Review Tool](#) to assist the EPDP-IDNs Team’s deliberations

Public Comment Statistics

No. of Submissions	8
No. of Commenters	8
Commenters	<ul style="list-style-type: none">• Michael Bauland• ICANN org• NCSG• RrSG• BC• RySG• ALAC• GAC
No. of Outputs that Received Comments	17 out of 20 <i>(PR1, IG2, PR3, PR4, PR6, IG7, PR8, PR9, PR10, PR11, IG12, PR13, PR14, IG15, IG17, PR18, PR20)</i>
No. of Outputs that Received Significant Concerns or Objections	9 out of 20 <i>(Some are staff designations, as some commenters did not explicitly indicate the level of support or non-support)</i>
Charter Qu's with NO Outputs that raised Questions from Commenters	4 out of 8 <i>(C3, C3a, C6, D5)</i>

Higher Concentration of Comments and/or Significant Concerns/No Support

- **Implementation Guidance 2:** Automatic allocation and activation process
- **Preliminary Recommendations 8-9:** Source domain name (**Comment only received for PR9*)
- **Preliminary Recommendations 10-11, Implementation Guidance 12:** Transfer Policy
- **Preliminary Recommendations 14 and Implementation Guidance 15:** Mechanism and service for the realization of the “same entity” rule, including the use of Registration Data Directory Services (RDDS)
- **Preliminary Recommendation 20:** Defining the proper vehicle for the update of the IDN Implementation Guidelines

Topics Related to Charter Questions without Outputs

- **Charter Question D5:** Extensible Provisioning Protocol (EPP) update and transaction fees
- **Charter Question C3:** How to uniquely identify a registrant to implement the “Same Entity” principle
- **Charter Question C3a:** How to uniquely identify a registrant to implement the “Same Entity” principle
- **Charter Question C6:** If the IDN Table should be formatted in a machine-readable manner

4. Start Review of Phase 2 Initial Report Public Comment

Global Change for Terminology

Non-Substantive

“Grandfathered”

- Request changes to:
 - pre-existing domains
 - exempted domains
 - domains created before a certain date
- Commenter: ICANN org
- Rationale: “Grandfathered” has a deep-rooted racial history in the United States - Language should evolve to be more inclusive, accurate, and respectful.
- Linked Outputs: PR3, PR4, PR8, PR9, PR10, PR11, PR14

Non-Substantive

Registry Operator(s)

- Request change to:
 - gTLD registry operator(s)
- Commenter: RySG
- Rationale: Given that this is a GNSO sponsored PDP and there are certain preliminary recommendations intended for gTLD registries to implement, making a global change to replace the term is highly recommended to avoid confusion as to who is requested to perform the activities.
- Linked Outputs: IG2, PR6

Comments for Preliminary Recommendation 1

Charter Question C1: Both the SubPro PDP and the Staff Paper recommend that: 1) a given second-level label beneath each allocated variant TLD must have the “same entity”; and 2) all allocatable second-level IDN variant labels that arise from a registration based on a second-level IDN table must have the “same entity”. **Should this Recommendation be extended to existing second-level labels?**

- **PR1:** The “same entity” principle applies to the allocation of future variant domain names. This means that all allocatable variant domain names from a variant domain set must be allocated or withheld for possible allocation only to the same registrant. Additionally, all allocated domain names must be at the same sponsoring registrar.

Non-Substantive

Support Recommendation as written

- **Commenter:** RrSG
- **Comment:** The RrSG supports this Recommendation that the “same entity” principle applies to the allocation of future variant domain names, and would raise some practical considerations regarding this principle. **How does a registrar know that a domain is an IDN variant? How is a registrar to know that a source or variant domain is already registered with another registrar? When an IDN source or variant domain is registered, can the registrar access a list of other variants which are available at that time?** These questions may all be answered with a technical solution such as an **EPP extension**.
- **EPDP-IDNs Team Action:** Need confirmation

Non-Substantive

Support Recommendation intent with wording change

- **Commenter:** ICANN org
- **Comment:** Is the EPDP Team in agreement with ICANN org’s assumption that **the “same entity” principle noted in Preliminary Recommendation 1 applies only to the Second-level and not the Third-level**, as the Third-level is beyond the control of ICANN, and registries/registrars?

**(Staff’s analysis - ICANN org did not explicitly select this “support recommendation intent with wording change” option, but categorized it here as an assumption was raised requesting the EPDP Team’s confirmation)*

- **EPDP-IDNs Team Action:** Need confirmation

Comments for Preliminary Recommendation 3

Charter Question C1: Both the SubPro PDP and the Staff Paper recommend that: 1) a given second-level label beneath each allocated variant TLD must have the “same entity”; and 2) all allocatable second-level IDN variant labels that arise from a registration based on a second-level IDN table must have the “same entity”. **Should this Recommendation be extended to existing second-level labels?**

- **PR3:** Immediately prior to the policy effective date of the “same entity” principle as set out in Preliminary Recommendation 1, the existing variant domain names that do not conform to the “same entity” principle must be grandfathered. This means that there will be no change to the contractual or allocation status of such existing variant domain names. The requirement of having the same registrant and the same sponsoring registrar will not be applied retroactively.

Non-Substantive

Support Recommendation intent with wording change

- **Commenter:** RySG
- **Comment:** Add a sentence to the end of the Recommendation - ***"The requirement (of having the same registrant and the same sponsoring registrar) will not be applied retroactively. gTLD Registries must determine variant sets for each grandfathered label as if it was a source domain name and protect from registration all variant labels in all such variant sets in all variant gTLDs, as appropriate."***
- **EPDP-IDNs Team Action:** Need review of the language and revise as appropriate

Comments for Preliminary Recommendation 4

Charter Question C2: Currently Registry Operators may activate the IDN variant labels at the second-level when requested by the sponsoring Registrar of the canonical name as described in the IDN Tables and IDN Registration Rules. Both the SubPro PDP and the Staff Paper recommend that at the second-level, the same entity definition can be achieved by ensuring that the registrant is the same. **Should this recommendation be extended to the already activated IDN variant labels at the second-level? How does the “same entity” requirement impact the current rules for Registry Operators for activating IDN variant labels?**

- **PR4:** Any allocatable variant domain names of grandfathered domain names pursuant to Preliminary Recommendation 3 cannot be allocated unless and until only one registrant and one sponsoring registrar remain for the grandfathered domain name(s) from the relevant variant domain set.

Non-Substantive

Support Recommendation as written

- **Commenter:** RrSG
- **Comment:** In this scenario the registry would need to keep track of what domains and variants exist, as the registrar would not have access to that information.
- **EPDP-IDNs Team Action:** Need confirmation

Comments for Preliminary Recommendation 6

Charter Question C5: There is existing practice by registries to harmonize IDN tables, but there is no data on the various methods they may have used. The Staff Paper suggests maintaining a common set of harmonized second-level IDN tables for all IDN variant TLDs and then (a) choosing all these IDN tables to offer for all IDN variant TLDs, or (b) choosing a relevant different subset of IDN tables to offer for each different IDN variant TLD. **The WG and the SubPro IRT to coordinate and consider the following question in order to develop a consistent solution: are the above suggested methods in the Staff Paper sufficient for IDN table harmonization purposes? Should any additional implementation guidance be provided for a registry?**

- **PR6:** The baseline criteria for implementing IDNs at the second-level must be security and stability of the DNS. Registry operators, ICANN org and other relevant stakeholders must develop minimum IDN variant deployment requirements (i.e., variant sets) that do not compromise the stability and security of the DNS.

Non-Substantive

Support Recommendation as written

- **Commenter:** RrSG
- **Comment:** This is a very important recommendation, especially when considering the security risk presented by homographs. The minimum IDN variant deployment requirements should be developed with input from registrars, as registrars have experience which may assist the process.
- **EPDP-IDNs Team Action:** N/A

Comments for PR6 and IG7

- **PR6:** The baseline criteria for implementing IDNs at the second-level must be security and stability of the DNS. Registry operators, ICANN org and other relevant stakeholders must develop minimum IDN variant deployment requirements (i.e., variant sets) that do not compromise the stability and security of the DNS.
- **IG7:** ICANN org, gTLD registries, and other relevant stakeholders should collaborate to develop minimum IDN variant deployment requirements (i.e., variant sets) at the second-level. This should include respecting IDNA2008, IDN Implementation Guidelines, and any future versions of these two documents. In addition, this process can consider multiple sources of work, including but not limited to current registry operational practices, second-level reference LGRs, and the Root Zone LGR.

Non-Substantive

Support Recommendation as written

- **Commenter:** RySG
- **Comment:** The RySG appreciates that the topic on minimum IDN variant deployment requirements at the second-level was one of the most challenging topics during the Phase 2 work and a lengthy collaborative process between the RySG and ICANN org have resulted in Recommendation 6 and Implementation Guidance 7. The RySG urged that these two items be considered as a pair for next steps, particularly in the call for relevant expertise to undertake the development of minimum IDN variant deployment requirements (i.e., variant sets) at the second-level.
- **EPDP-IDNs Team Action:** N/A

Comments for PR6 and IG7

- **PR6:** The baseline criteria for implementing IDNs at the second-level must be security and stability of the DNS. Registry operators, ICANN org and other relevant stakeholders must develop minimum IDN variant deployment requirements (i.e., variant sets) that do not compromise the stability and security of the DNS.
- **IG7:** ICANN org, gTLD registries, and other relevant stakeholders should collaborate to develop minimum IDN variant deployment requirements (i.e., variant sets) at the second-level. This should include respecting IDNA2008, IDN Implementation Guidelines, and any future versions of these two documents. In addition, this process can consider multiple sources of work, including but not limited to current registry operational practices, second-level reference LGRs, and the Root Zone LGR.

Non-Substantive

Support Recommendation intent with wording change

- **Commenter:** ICANN org
- **Comment:** Reiterating previous org input provided on the Phase 1 Final Report, ICANN org suggests that the EPDP Team be discerning of the different implications when using terms such as “must” and “should” while providing its output. This is particularly crucial in instances where similar language is used, to prevent discrepancies and misinterpretations during policy implementation. The EPDP Team may want to clarify the language in these two outputs, as there seems to be a contradiction. **Preliminary Recommendation 6 implies that developing “minimum IDN variant deployment requirements” is required, while Implementation Guidance 7 suggests that it is optional. Preliminary Recommendation 6 states: “...Registry operators, ICANN org and other relevant stakeholders **must** develop minimum IDN variant deployment requirements (i.e., variant sets)...” while Implementation Guidance 7 states: “ICANN org, gTLD registries, and other relevant stakeholders **should** collaborate to develop minimum IDN variant deployment requirements (i.e., variant sets)...”**
- **EPDP-IDNs Team Action: Need revision as appropriate**

Non-Substantive

Support Recommendation intent with wording change

- **Commenter:** ALAC

- **Comment:**

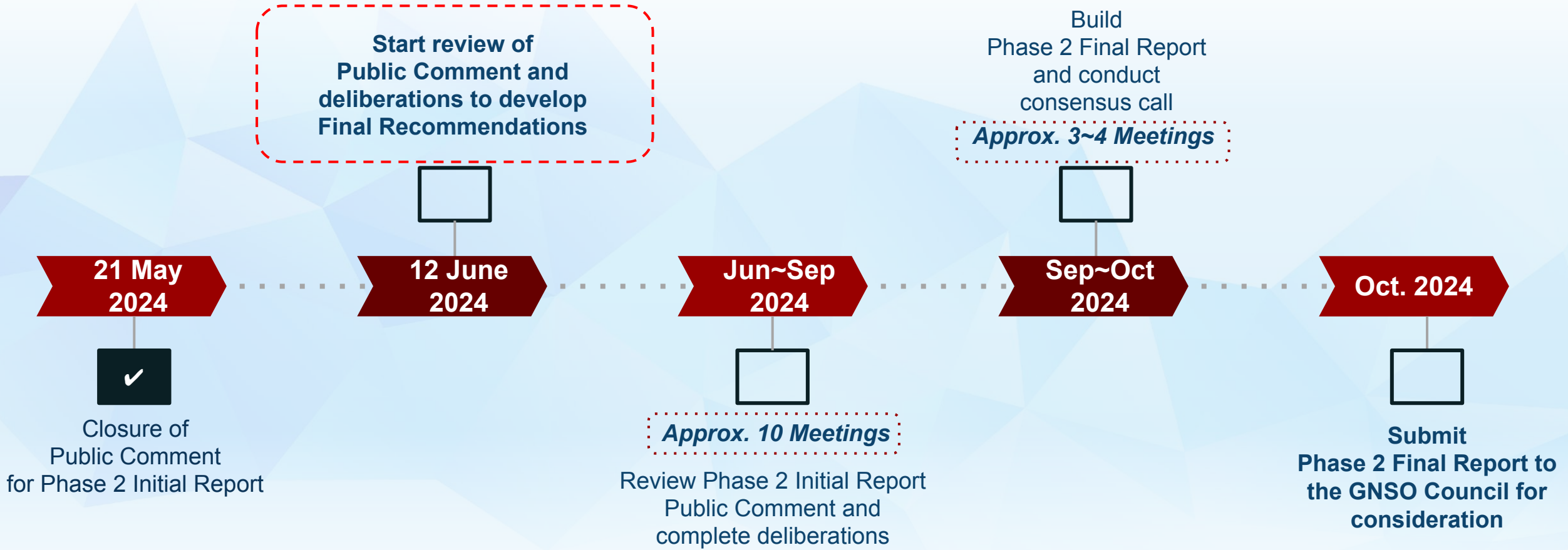
1. In Preliminary Recommendation 6 as well as in Implementation Guidance 7, there is mention of “...should collaborate to develop minimum IDN variant deployment requirements (i.e., variant sets).” We think the phrase “**variant sets**” **appears to be inconsistent with the rest of the text and intention of that implementation guidance, and can perhaps be deleted.**

2. **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”.**

- **EPDP-IDNs Team Action: Need revision as appropriate**

5. Next Steps

Next Steps



6. AOB



Thank You and Questions

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