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AT-LARGE ADVISORY COMMITTEE

ALAC Statement on the IDN Variant TLD Program – Interim Report Examining the User Experience Implications of Active Variant TLDs

Introduction

By the Staff of ICANN

Edmon Chung, At-Large member from the Asian, Australasian and Pacific Islands Regional At-Large Organization (APRALO) and the ALAC IDN Policy Liaison, composed an initial draft of this Statement after discussion of the topic within At-Large and on the Mailing Lists.

On 4 December 2012, this Statement was posted on the <u>At-Large IDN Variant TLD Program – Interim Report Examining the User Experience Implications of Active Variant TLDs Workspace</u>.

On that same day, Olivier Crépin-Leblond, Chair of the ALAC, requested ICANN Policy Staff in support of ALAC to send a call for comments on the draft Statement to all At-Large members via the <u>ALAC-Announce</u> <u>Mailing List</u>.

On 7 December 2012, a version incorporating the comments received was posted and the Chair of the ALAC requested that Staff open a five-day ALAC ratification on the Statement.

On 13 December 2012, Staff confirmed that the online vote resulted in the ALAC endorsing the Statement with 14 votes in favor, 0 votes against, and 0 abstentions. You may review the result independently under: https://www.bigpulse.com/pollresults?code=28169ZtpN7yRxSZcxEI5z3vc

The Chair then requested that the Statement be transmitted to the Public Comment process, copying the ICANN Staff member responsible for this Public Comment topic.

[End of Introduction]

ALAC Statement on the IDN Variant TLD Program – Interim Report Examining the User Experience Implications of Active Variant TLDs

The ALAC thanks the IDN Variant TLD (Project 6) team for publishing the Interim Report on Examining the User Experience Implications of Active Variant TLDs for public comments. First of all, the ALAC commends the generally thorough stocktaking of issues related to user experience of IDN Variant TLDs presented by the Interim Report. At the same time, the ALAC makes the observation, which the document also touches on, that these issues may be mitigated against by registry policy measures along with relevant materials and resources for users (including administrative and technical users).

The ALAC makes the following inquiries to the team:

- 1. The Interim report explains that "the final report, to be published within ninety (90) days after the closure of the public comment forum" and that "based on community input, the final report will include guidelines and recommendations to address or mitigate the negative impacts identified in this report." Furthermore, it explains that "this report is the first part of one study to examine potential challenges from a user experience perspective when variants of IDN TLDs are activated" and that "by publishing this interim report, we seek to establish a dialog with the community to refine these principles and challenges, which will guide the second part of the study to formulate the guidelines and recommendations for activating variant TLDs." What is unclear is that whether we are talking about 2 types of "final report", one for the finalizing of this report which identifies the issues (supposedly to be completed within 90 days after the closure of the public forum), and another completely different one which is the second part of the study which contains the guidelines and recommendations? Or in fact they are one and the same. Should they be two completely different reports, the process makes sense. If however, they are one and the same, there is significant concern that the community is not involved properly in the development of the guidelines.
- 2. The Interim Report identifies that there may be differences in the needs and user expectations for different linguistic communities. This is consistent with the community consensus on the subject as understood by ALAC and expressed in its previous correspondences on the subject. However there is no indication of whether the guidelines and recommendations would be differentiated between languages, how they would be arrived at and how affected linguistic communities would be consulted before such recommendations made and guidelines are developed. It would be useful for the team to better describe the process through which these anticipated work will be compiled.
- 3. The Interim Report correctly points out that "Linguistic communities are primarily concerned with end users, and consequently may advocate for a maximal variant label set to enable a diverse linguistic expression and easier accessibility. The technical community, on the other hand, is primarily concerned with the security and stability of the Domain Name System (DNS), and therefore stipulates the minimal number of variant labels (if any) be added to the root zone." As such, as an overall ICANN policy matter, the implementation of IDN Variant TLDs require the balance between the two. The Interim Report did not go further to explain how this study (and the further guidelines and recommendations) would/could be used to mitigate against the predominance of either of the two views of conservativeness to achieve at a reasonable compromise suitable for the implementation of IDN Variant TLDs.

In considering the work as presented so far in the Interim Report, the ALAC provides the following advice:

- In considering the presented potential issues, and how the ICANN community can mitigate against them,
 the team should provide better clarity to distinguish between 1. Issues that can and should be
 implemented as ICANN policies (e.g. directly through Registries and Registrars); 2. Issues for which
 ICANN policies have stronger influence (e.g. recommendations for registrants); and 3. Issues which
 ICANN and the ICANN community would produce materials and conduct outreach to raise awareness
 (e.g. guidelines for the technical community or the legal community).
- 2. Guidelines and recommendations sensitive to linguistic communities are important and thus should be developed with consultation from and best through bottom-up processes by the affected linguistic communities. More importantly, to identify critical aspects that should be implemented as requirements for IDN TLD registries. For example, in the Chinese IDN Variant TLD case, the statistics in the report showed that close to 20% of queries are directed towards the IDN Variant TLD. This means that there is 1 user using the IDN variant TLD for every 4 users using the primary IDN TLD. This presents strong evidence that ICANN should implement policies to require all Chinese IDN TLD registries to serve the preferred variant as the IDN Variant TLD, to ensure both consistency in the root and a reasonable user experience and consumer trust for IDN TLDs.
- 3. Separate guidelines and recommendations should be developed for different linguistic communities. As evidenced in the report, the requirements and needs of different linguistic communities for IDN Variant TLDs are different from each other. All the relevant policies, guidelines and recommendations should be developed with consultation and through bottom-up processes by the affected language communities.