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## **AT-LARGE ADVISORY COMMITTEE**

### **ALAC Statement on the IDN Variant TLD Program – Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels – Second Public Comment Draft**

#### **Introduction**

By the Staff of ICANN

An initial draft of this Statement was composed by the following individuals after discussion of the topic within At-Large and on the Mailing Lists:

- Edmon Chung, At-Large member from the Asian, Australasian and Pacific Islands Regional At-Large Organization (APRALO) and the ALAC IDN Policy Liaison; and
- Rinalia Abdul Rahim, ALAC member from the APRALO and ALAC Executive Committee member.

On 08 January 2013, this Statement was posted on the [At-Large IDN Variant TLD Program – Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels – Second Public Comment Draft Workspace](#).

On that same day, a call for comments on the draft Statement was sent to At-Large members via the [ALAC Announce mailing list](#).

On 16 January 2013, a version incorporating the comments received was posted on the Workspace.

On that same day, Olivier Crépin-Leblond, the Chair of the ALAC, requested that Staff open a five-day ALAC ratification on the Statement.

On 15 January 2013, Staff confirmed that the online vote resulted in the ALAC endorsing the Statement with 13 votes in favor, 0 votes against, and 0 abstentions. You may review the result independently under: <https://www.bigpulse.com/pollresults?code=2892wTQTb6BAMQQRHbYqqHq8>

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]

The original version of this document is the English text available at <http://www.atlarge.icann.org/correspondence>. Where a difference of interpretation exists or is perceived to exist between a non-English edition of this document and the original text, the original shall prevail.

# **ALAC Statement on the IDN Variant TLD Program – Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels – Second Public Comment Draft**

## **Acknowledgment of Project 2.1 Team Achievement**

The At-Large Advisory Committee (ALAC) commends the IDN Variant TLD Program Project 2.1 Team for its efforts and contributions in establishing vital procedures that will enable the delegation and management of IDN Variant TLDs toward enhancing multilingualism and cultural diversity on the Internet.

We appreciate the Project Team’s openness to input and we are pleased to see the incorporation of some of our suggestions in the revised “Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels.”

## **The 2-Panel Process and Effective Outreach**

We reiterate our support for the 2-panel process in the development of the Label Generation Rules for the root zone, which allows different IDN language and script communities to form and move at their own pace in implementing IDN Variant TLDs.

For effective outreach to various language and script communities that may be interested in forming Generation Panels, we call on ICANN to ensure that all announcements and reports related to the implementation of IDN Variant TLD be published in multiple languages, particularly the languages addressed by the Variant Case Studies and the ones recommended for prioritization in the Procedure Document.

## **Limited Supply of Global Experts for the Integration Panel**

We note with concern that the supply and availability of experts in Unicode and linguistics, who could qualify for the Integration Panel, are limited. This limitation is problematic for the following reasons: (a) It makes it challenging to ensure diverse cultural backgrounds among the panel members; (b) It places the continuity of the Label Generation Rules process at risk where communities that enter the process late may be affected adversely; (c) It allows for the possibility of process capture by a few experts.

We urge ICANN to ensure the sustainability of the Label Generation Rules process for the global language and script communities, who are at different levels of readiness to develop Label Generation Rules for their specific script, writing system and language. We recommend that ICANN undertake strategies to secure a steady supply of qualified Unicode and linguistics experts to support the Label Generation Rules process while placing appropriate term limits that safeguard the process against capture. These strategies may include the provision of appropriate incentives as well as capacity building.

## **Governance Oversight and the Public Comments Process**

We recognize that the Integration Panel requires independence to carry out its task. We wish to stress that this independence needs to be accompanied with high standards of transparency and strong accountability measures. The Procedure Document specifies the ICANN Public Comments as the primary governance oversight mechanism for the decisions of the Integration Panel. This mechanism has certain weaknesses: (1) It has no review process; (2) It does not include an appeal process for the decisions of the Integration Panel; and (3) The challenges associated with the Public Comments process still apply (e.g., participation of relevant stakeholders, sufficient comment period, etc.). It is imperative that ICANN address the weaknesses of the proposed mechanism to support a transparent and accountable process of developing Label Generation Rules for the root.

The Procedure Document points out the following: “There is an argument that could be made that the population of the root LGR is making policy. In which case, the current policy-making procedures in the ccNSO and gNSO could be used.” Unless there is a compelling reason as to why the Label Generation Rules process should be independent of the oversight mechanisms of the ICANN Supporting Organizations (SOs), which should be communicated to the community, the ALAC advises the ICANN Board to authorize the respective SOs (i.e., GNSO and ccNSO) to oversee the implementation of the proposed mechanism. The appropriate governance oversight measures should include periodic reviews, high standards of transparency and accountability structures worthy of the ICANN bottom-up multi-stakeholder model. Furthermore, special emphasis on the effective engagement and participation of affected linguistic communities would be crucial throughout the LGR process.

### **Enabling Policies**

Given the prioritization of IDNs in the new gTLD process, the ALAC strongly advises the ICANN board and community to begin addressing the policies required to render the procedures for IDN Variant TLD delegation operational on an urgent basis. Statistics from the Interim Report of the IDN Program Project 6 on User Experience highlights that almost 20% of user queries could be directed towards an IDN Variant TLD. This means that without the delegation of the IDN Variant TLD, almost 20% of users would have a negative experience. Without having the requisite enabling policies in place to support the roll out of the new gTLDs, the prioritization of IDNs would in fact significantly hurt consumer trust and serve as a disservice to the IDN community.

### **Communicating Convergence Effectively**

The Procedure Document indicates that, “the mechanism is not the last stage in making determinations about IDN labels for the root. Rather, its output is to be consumed by other ICANN procedures that actually determine whether a particular label is allocated to someone, and whether it is delegated in the root.” We request that ICANN clarify how the various procedures and processes interface, interact or converge against an estimated timeline for the benefit of the community.

### **Summary of ALAC Recommendations**

The ALAC:

- Recommends that all announcements and reports related to the implementation of IDN Variant TLD be published in multiple languages, particularly the languages addressed by the Variant Case Studies and the ones recommended for prioritization in the Procedure Document.
- Recommends that ICANN undertake strategies to secure a steady supply of Unicode and linguistics experts to support the Label Generation Rules process while placing appropriate term limits that safeguard the process against capture.
- Advises the ICANN Board to authorize the respective SOs (i.e., GNSO and ccNSO) to oversee the implementation of the proposed governance oversight mechanism unless there is a compelling reason as to why the Label Generation Rules process should be independent of the oversight mechanisms of the ICANN Supporting Organizations (SOs), which should be communicated to the community.
- Advises the ICANN board and community to begin addressing the policies required to render the procedures for IDN Variant TLD delegation operational on an urgent basis.
- Requests that ICANN clarify how the various IDN Variant TLD procedures and processes interface, interact or converge against an estimated timeline for the benefit of the community.