

NCSG Comment on the Initial Report of the GNSO Translation and Transliteration of Contact Information PDP WG

The Non-Commercial Stakeholder Group (NCSG) is submitting these comments in response to the draft recommendations provided in the initial report of the Translation and Transliteration (transformation) of Contact Information PDP WG, as well as to address some of the arguments both in favor and against mandatory transformation of contact information.

The NCSG does believe that registration of domain names and internationalized domain names should be provided in different languages and different scripts. We additionally believe that submission and display of contact information of the domain name holder in the Registration Data Services (RDS) should be made available in different languages and scripts in order to meet the needs of potential registrants whose native languages do not use Latin or ASCII based characters. This is consistent with the recommendations made in the final report of the Internationalized Registration Data (IRD) Working Group (<http://gnso.icann.org/en/issues/ird/final-report-ird-wg-07may12-en.pdf>). However, the NCSG does not believe that mandatory transformation of contact data in the RDS is desirable or even truly feasible. We support the arguments provided in this working group's initial report against mandatory transformation, but question the rationale behind the arguments in favor of mandatory transformation.

In terms of desirability, the NCSG does not believe that there is any benefit to the registrant in a policy requiring mandatory transformation of contact information. Moreover, and as the initial report accurately explains, in many cases for domain name holders who are not proficient in English or any other language based on Latin script, the registrant may not be in a position to accurately make this transformation or even validate that the transformation has been done accurately by a third party (such as the registrar or registry). This could potentially lead to breaches in contractual obligations by domain name registrants that are beyond their control.

Furthermore, the costs involved with a policy requiring mandatory transformation of all internationalized contact information in the Whois could potentially be high enough to be extremely disproportionate to the need to provide it. Right now, there is no reliable empirical data to suggest the scale of which transformation of contact data will be in demand. In the event of a policy and contractual requirement (either on the part of the ICANN accredited registrar, the registrant or both) to provide transformed contact information, there would be a shift in transaction costs away from those actually requiring this feature to others who do not, in addition to potentially massive new costs in unnecessarily transforming contact information that is not being searched for in the Whois by a user not using the original language. This would also add an unfair financial burden to new registrars being set up to service registrant in developing and underserved regions (as opposed to existing

registrars serving customers who use Latin-based script in their native languages).

This is a particular problem because the very Registrars who would be most impacted by the cost, difficulty and inconvenience of the transformation of this data are those we are trying hardest to attract. The ICANN Community actively seeks Registrars in developing countries and Registrars who seek to serve their countries and communities in the local language, currency and custom. Imposing additional costs on these Registrars will make it more difficult for them to join us and bring their customers into the ICANN Community, not less, and will make their costs far higher than Registrars operating in Latin-character countries. That's complete opposite to our overall goals for these regions and Registrars.

Apart from desirability, the usability of transformed contact information is also highly questionable. One reason, mentioned above, is the potential inability of the registrant to validate the accuracy of the transformation. Moreover, different languages have no standardized method of transliterating words from their original script into others. This could lead to inconsistency in the transformations being conducted making cross-referencing registration of domain names using the transformed data very unreliable. This would suggest that searching for registration data in its original language/script would be far more reliable.

The NCSG agrees with and endorses all 7 of the recommendations as they exist in the initial report with a change to Recommendation 2 as noted below (<http://gnso.icann.org/en/issues/gtlds/transliteration-contact-initial-15dec14-en.pdf%20>).

⇒ #2 The Working Group could recommend that ~~any new~~ Registration Directory Service (RDS) WHOIS databases, now and in the future, ...

We recommend that these recommendations be adopted, as slightly amended above, in the working group's final report.

Rafik Dammak
Chair, Noncommercial Stakeholder's Group