Community Comment 2		
Public Comment Review Tool		
4.1 Internationalized Domain Names		
#	**Comment**	**Contributor**	**WG Response**
4.1.1 - Do you agree or disagree with allowing 1-char IDN TLDs, in specific combinations of scripts and languages where a single character can mean a whole idea or a whole word (ideograms or ideographs)?		

1	See SAC052: SSAC Advisory on Single-Character Internationalized Domain Name Top-Level Domains (31 January 2012) at: https: //www.icann.org/en/groups/ssac/documents/sac-052-en.pdf Board Advice Status: CLOSED See Board Advice Status Report and Definitions at: https://www.icann.org/en/system/files/files/board-advice-status-report-pdf-30apr17-en.pdf and https://features.icann.org/board-advice Recommendation 1: Given the potential for user confusion and the currently unfinished work on string similarity and IDN variants, SSAC recommends a very conservative approach to the delegation of single-character IDN top-level domains. In particular, until ICANN completes its work on user confusion/string similarity and IDN variants, SSAC recommends: 1. Delegation of all single-character IDN TLDs in all scripts should be disallowed by default. 2. Exceptions may be made for some scripts, but only after careful consideration of potential confusability both within and across scripts. Such consideration should invite comments from the technical and linguistic community, and from ICANN's advisory committees. 3. Single-character TLD applications in an exceptionally allowed script should be accepted only when there is clear evidence that there is no risk of user confusion. Each applied-for single-character TLD label must be explicitly examined across scripts to ensure that there is absolutely no possibility of user confusion within or across scripts. 4. ICANN should consult with the technical and linguistic community to determine which scripts, if any, should be restricted with respect to the delegation of single-character TLDs, and how any such restrictions should be defined, and how such restrictions may be relaxed if appropriate. 5. ICANN should take into consideration the outcome of the IETF work on the creation of a concise specification of the TLD label syntax based on existing syntax documentation, extended minimally to accommodate IDNs. 6. ICANN should consider adopting the following guidelines regarding its consideration of which scripts and code points could be accepted as exceptions: a) The code point must be PVALID according to IDNA2008. b) The code point is from one of the following Unicode categories: lower case letter (Ll), upper case letter (Lu), and other letter (Lo) as defined by the Unicode Standard c) Some single-character IDN TLDs are composed of multiple Unicode code points, which may include non Lx-class codepoints. These should be subjected to a more stringent technical and confusability analysis, whose criteria should be well defined and made public. d) The script in which an exception is made and a single character IDN is allowed should not have characters that are intrinsically confusable with characters of another script (for example, Latin/Greek/Cyrillic, Lao/Thai, etc.). e) The existing and extended rules of confusability must be met. Single-character code points must explicitly be examined across scripts. Denial of a single-character TLD application does not imply blocking of the script; similarly, acceptance of a single-character TLD application does not imply acceptance of the script. f) If a script is allowed, a distinct and explicit specification of which subset of the script is available for single-character TLDs should be required prior to the acceptance of a single-character TLD application. By default all characters are disallowed, even when a script is allowed, and an explicit single-character-TLD-allowed list must be generated for each case. Recommendation 2: Because important relevant work on string similarity, IDN variant issues, and TLD label syntax is currently underway within ICANN, the IETF, and other bodies, ICANN should review the Findings of this report, and any policies that it adopts in response to Recommendation 1, no later than one year after the three work items mentioned above have been completed.	SSAC	
2	Agree. As a community we should be careful to recognise what is true of the latin language based world is not necessarily the case when using IDNs.	Nominet	

3	The BRG concurs with the RySG comments: We agree that 1-char IDN TLDs should be allowed, in specific combinations of scripts and languages where that character represents a whole word or concept. 1-character IDNs, whether at the top- or second-level, are represented by much longer strings. (For example, "喜" is not a 1-character string, it is a 7-character string, "xn--s1r".) Therefore, "1-character IDN TLDs" should be allowed (but are a misnomer, as they are not "1-character" strings.)	BRG	
4	Disagree.	John Poole	
5	Afilias supports the recommendations of SAC052 "SSAC Advisory on Single Character Internationalized Domain Name Top-Level Domains".	Afilias	
6	We agree that 1-char IDN TLDs should be allowed, in specific combinations of scripts and languages where that character represents a whole word or concept. 1-character IDNs, whether at the top- or second-level, are represented by much longer strings. (For example, "喜" is not a 1-character string, it is a 7-character string, "xn--s1r".) Therefore, "1-character IDN TLDs" should be allowed (but are a misnomer, as they are not "1-character" strings.)	RySG	
7	We agree with the proposal to allow single-character IDN TLDs. For some language and cultural communities, the single character IDN TLD may be an option. This should not be applicable for a "mono-scripts", such as Latin, Russian or Greek. But might work for China or neighboring countries, where a single hieroglyph might carry complete meaningful description. There are no major technical issues in single character IDN TLDs, but the potential for user confusion, in general, would be higher in these cases. It would be safer, from a confusability perspective, to permit such TLDs only on a case-to-case basis for particular languages, rather than by default.	ALAC	
8	Provided such TLDs are subject to all the usual string confusion mitigation and legal rights principles we believe they should be allowed.	Valideus	

4.1.2 - Do you have any general guidance or would you like to flag an issue requiring policy work for subsequent procedures regarding IDNs?

1	IDNs should be primarily ccTLDs when they concern a language predominantly limited to a single nation (see RFC 1591).	John Poole	
2	Afilias supports the recommendations of SAC060 "SSAC Comment on Examining the User Experience Implications of Active Variant TLDs Report". Afilias supports the application of the design principles described in SAC084 "SSAC Comments on Guidelines for the Extended Process Similarity Review Panel for the IDN ccTLD Fast Track process" in the consideration of all IDNs.	Afilias	
3	The current IDN policies are adequate for subsequent procedures. We do not believe that IDN-related issues should be handled discretely from overall policy development related to IDNs. IDN policies should apply equally to "legacy TLDs", TLDs from the 2012 round, and TLDs from a future application process.	RySG	
4	For single-character IDNs, it would be prudent to consider additional policy safeguards such as the requirement for one or more of: 1) community support; 2) cultural-linguistic research paper(s); and 3) local government support.	ALAC	

4.1.3 - How do you envision the policy and process to allow IDN Variant TLDs to be delegated and operated? Possible options include but are not limited to bundling (allowing but requiring procedures similar to .ngo/.ong where only the same registrant can register a name across TLDs), disallowing (as it was in the 2012-round) or allowing without restrictions. Must there be a solution established prior to launching subsequent procedures?

1	GEO TLDs should be allowed to bundle TLDs with Variants AND different ways to write i.e. a city name in relevant languages. So for instance .GENEVA should also be allowed to be bundled with .GENF and .København with .COPENHAGEN. If one domain name is registered in .GENF the same registrants also registers .GENEVA – this would cause no consumer confusion.	Jannik Skou	
2	No. ICANN should allow for diverse business models. As the Registry Operator for sister domains .CYMRU and .WALES we recognise that there are a number of business models that could apply to operating a TLD in connection with each another. We do not think it is for ICANN to dictate how such models should work in a commercial operational environment.	Nominet	
3	Yes.	John Poole	
4	No comment.	Afilias	

5	For IDN Variant TLDs, bundling is advisable, to guard against confusion for registrants and other users. However, this is not a gating question and need not be resolved prior to launching subsequent procedures.	RySG	
6	We believe that this is a complex issue when considered from an end-user perspective. Besides variants, there are also multiple options such as idn.ascii, ascii.idn, idn.idn and also the left-to-right and right-to-left variations. We suggest that this issue must be addressed taking through a participator process that includes end-user communities and other relevant stakeholders. Considerations include: • For end-users, additional bundled variant registration may causing cost increases as well difficulties in search engine optimization (SEO); • Unbundled variant registration may cause unfair competitive registrations; • Registries and registrars may have a motivation in collecting fees from bundled/unbundled variant registrations From a purely end-user centric position, priority should be given to IDN TLD in case of competing variant applications (such as IDN city name vs. ASCII city name in non-Latin language communities). On the matter of variant TLDs, from a stability and resilience perspective, we make the following suggestions: 1. The two TLDs must have the same Registry Operator (RO) and handled as one unit. The two TLDs must be delegated to the same set of name servers. 2. The WHOIS of the two domains must be handled consistently, possibly through a common interface. 3. The registrations of Second-Level Domains (SLDs) must be synchronized so that if an SLD is registered under one variant, it must also be registered under the other by the same registrant and the same registration information or be blocked. Such an SLD pair must be handled as a unit that cannot break. 4. The registrations must be maintained in a shared database. 5. When querying WHOIS for an SLD, all variants should be reported as such. 6. In case the RO fails, back-up options must be in place. This means that ICANN must standardize how a pair of TLDs is registered, and ensure its compliance to the procedure. ICANN policy must ensure that unified approach to variants is maintained for the lifetime of the label.	ALAC	
4.1.4 - Should the process of allowing 1-char IDN TLDs and IDN Variant TLDs be coordinated and/or harmonized with ccTLDs? If so, to what extent?			

See SAC060: SSAC Comment on Examining the User Experience Implications of Active Variant TLDs Report (23 July 2013)
at: https://www.icann.org/en/groups/ssac/documents/sac-060-en.pdf

Board Advice Status: CLOSED 1,5,6,7,10,11,12,13,14; OPEN - IN IMPLEMENTATION 2,3,4,8,9

See Board Advice Status Report and Definitions at: https://www.icann.org/en/system/files/files/board-advice-status-report-pdf-30apr17-en.pdf and https://features.icann.org/board-advice

Recommendation 1: The root zone must use one and only one set of Label Generation Rules (LGR).

Recommendation 2: ICANN must maintain a secure, stable and objective process to resolve cases where some members of the community (e.g., an applicant for a TLD) do not agree with the result of the LGR calculations.

Recommendation 3: ICANN should concentrate foremost on the rules for the root zone.

Recommendation 4: ICANN should coordinate and encourage adoption of these rules at the second and higher levels as a starting point by:
• Updating the IDN Implementation Guidelines and recognizing that a modified version of these rules or a review or appeals process must be required to address special cases for the first and second levels;
• Maintaining and publishing a central repository of rules for second level domains (2LD) for all Top Level Domains (TLDs), encouraging TLD operators to publish their LGRs publicly in the repository maintained by ICANN; and
• Conducting specific training and outreach sessions in cooperation with generic TLD (gTLD) and country code TLD (ccTLD) operators who intend to launch Internationalized Domain Name (IDN) 2LDs or IDN TLDs, with a focus on consistency of user experience. The outreach should include among others registrants, end users and application developers.

Recommendation 5: Be very conservative on code points allowed in the root zone.

Recommendation 6: Because the implications of removing delegations from the root zone can have significant non-local impact, new rules added to LGR must, as far as possible, be backward compatible so that new versions of the LGR do not produce incompatible results with historical (existent) activations.

Recommendation 7: Should ICANN decide to implement safeguards, it should seek to distinguish two types of failure modes when a user expects a variant to work, but it is not implemented: denial of service versus misconnection.

Recommendation 8: A process should be developed to activate variants from allocable variants in LGR.

Recommendation 9: ICANN must ensure Emergency Back-End Registry Operator (EBERO) providers support variant TLDs, and that parity exists for variant support in all relevant systems and functions associated with new TLD components.

Recommendation 10: In the current design of rights protection related to the Trademark Clearinghouse (TMCH) process there is a risk of homographic attacks. The roles of the involved parties, specifically registrars, registries and TMCH, related to matching must be made clear.

Recommendation 11: When registries calculate variant sets for use in validation during registrations, such calculations must be done against all the implemented LGRs covering that script in which the label is applied for.

Recommendation 12: The matching algorithm for TMCH must be improved.

Recommendation 13: The TMCH must add support for IDN variant TLDs. Particularly during the TM Claims service a name registered under a TLD that has allocated variant TLDs should trigger trademark holder notifications for the registration of the name in all its allocated variant TLDs.

Recommendation 14: ICANN should ensure that the number of strings that are activated is conservative.

See SAC084: SSAC Comments on Guidelines for the Extended Process Similarity Review Panel for the IDN ccTLD Fast Track Process (31 August 2016) at: https://www.icann.org/en/system/files/files/sac-084-en.pdf

Board Advice Status: OPEN – UNDER REVIEW

See Board Advice Status Report and Definitions at: https://www.icann.org/en/system/files/files/board-advice-status-report-pdf-30apr17-en.pdf and https://features.icann.org/board-advice

Introduction: The Security and Stability Advisory Committee (SSAC) provides this brief comment on the "Proposed Guidelines for the Extended Process Similarity Review Panel (EPSRP) for the Internationalized Domain Name (IDN) country code Top Level Domain (ccTLD) Fast Track Process" and the related "Draft observations and recommendations of the country code Names Supporting Organization (ccNSO) Working Group on the EPSRP review."

The SSAC is aware of multiple issues with Internet Corporation for Assigned Names and Numbers (ICANN's) current collection of plans for handling IDNs in the Domain Name System (DNS) tree close to the root and will address them separately. This comment focuses specifically on the EPSRP, and some very basic issues that have been exposed in a review of these proposed guidelines

2	Yes. [If so, to what extent?] IDNs should primarily be ccTLDs where possible, but consistent policy affecting both ccTLDs and gTLDs is appropriate.	John Poole	
3	The process for considering and introducing 10character IDNs should be consistent with and no more restrictive than the ccTLD fast track guidelines.	Afilias	
4	Where a country-name is represented by a single IDN character, it may be allowed as a ccTLD based on the same fact that an IDN 1-character string is not, in fact, 1-character. However, it is not within the GNSO's remit to comment on ccNSO policies and the ccNSO is encouraged to comment and adapt their own policies.	RySG	
5	ccTLDs are generally an integral part of most IDN communities, and the local ccTLD plays significant role at the operational level as well as at the governance level. ccTLDs are thus an important stakeholder as any other SO/ACs for single char IDN TLDs and IDN variant TLDs. Therefore, the process of allowing single-character IDNs must be harmonized with ccTLDs, and single-letter TLDs should only be allowed in consultation with relevant ccTLDs.	ALAC	

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4.2 Universal Acceptance			
#	**Comment**	**Contributor**	**WG Response**
4.2.1 - Do you see any UA issue that would warrant policy development work, noting that there is extensive coordination work already being done by the Universal Acceptance Steering Group (https://uasg.tech/) ?			
1	Universal acceptance should also be based on how the registry manages their registry. We are seeing a few registries engaging in practices that allow a high percentage of the domain names to be used in scams or fraudulent behavior. Spamhaus reports often show mainly new gTLD registries in the top 10 of most abused tlds. (https://www.spamhaus.org/statistics/tlds)	BC	
2	No. However, new applicants should be made aware of the existing types of issues in advance of their application.	BRG	
3	As I've already answered hereinabove there are many unresolved UA issues and ICANN cannot shirk its duty owed to the global internet community including registrants, by relying on §1.2 of the RA. Needed: a process to disqualify gTLDs or strings, and require ICANN to post on its homepage and require all accredited registrars to post on their homepages a notice like this: "Important Notice to Registrants: Please note that annual registration renewal fees charged by new gTLD registry operators and registrars for new gTLD domain names can vary based on the domain and in some cases may be significantly higher than those fees charged for domains under legacy gTLDs such as .COM domain names. Also note that some new gTLDs' domain names may have experienced universal acceptance or collision issues. For more information go to [ICANN webpage dedicated to explaining new gTLDs' pricing, universal acceptance, and collision issues, to registrants]." See my CCT-RT comment for more.	John Poole	
4	Afilias supports the work of the Universal Acceptance Steering Group.	Afilias	
5	There are no current UA issues that will require policy development work.	RySG	
6	The Universal Acceptance Initiative (UAI) plays a significant role in the promotion of the equal and consistent domain name acceptance. However, this must not be mixed with policy development work within ICANN in order to keep the complexity of the things under control. For instance, the issue of similarity and confusability can be professionally reviewed by the UA group members, but only in form of participation of individual experts in appropriate policy development working groups within ICANN community. UAI, which is doing very valuable work, is a civil society initiative and not a direct ICANN initiative. As such, UAI cannot make binding policy, which has to be under ICANN. UAI can inform and guide the policymaking process in ICANN, but the policy process should proceed as a regular ICANN process.	ALAC	
7	We do not see such an issue.	Valideus	

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4.3 Application Evaluation			
#	Comment	Contributor	WG Response

4.3.1.1 - Do you believe that technical capability should be demonstrated at application time, or could be demonstrated at, or just before, contract-signing time? Or at both times? Please explain.

#	Comment	Contributor	WG Response
1	Technical Capability should be demonstrated at application and part of evaluation time. (Then PDT queuing will not be needed later. Applications on same platform need only one test (unless IDNs are also included at top level).	Jannik Skou	
2	At delegation. There are a range of competitive providers to choose from and adding the cost at the start is of little benefit.	Nominet	
3	Continuing review of technical capability is necessary at regular intervals for the security of the TLD.	BC	
4	The BRG concurs with the RySG comments: Technical capability should be shown at application time during the testing phase as was done in the 2012 application round. It would seem the best use of an evaluator's time to do the testing in groups instead of waiting until contracting is reached as this may result in periods of uncertainty based on contract negotiations etc. If an RSP accreditation programme is agreed then evaluation of individual registries would not be required.	BRG	
5	Afilias believes that technical capability should be known at application time or shown during the testing phase as was done in the 2012 application round. While Afilias does not support an accreditation program or a pre-approval process, if process efficiencies as described in the response to Questions 1.1.1-1.1.11 are developed, Afilias recognizes and supports that it may not be necessary to actively show technical capability as has been done during the testing phase.	Afilias	
6	Technical capability should be shown at application time during the testing phase as was done in the 2012 application round. It would seem the best use of an evaluator's time to do the testing in groups instead of waiting until contracting is reached as this may result in periods of uncertainty based on contract negotiations etc. If an RSP accreditation programme is agreed then evaluation of individual registries would not be required.	RySG	
7	We feel that there is no need to differentiate between ASCII or IDN in terms of technical capacity of the applicant. The main required option for IDN applicant might be full UA compliance in terms of SRS front-end and Web. Since technical operations of the TLD is no more a new thing, only new technical centers/operators need to demonstrate capacity and operations prior to contract signing. One additional aspect that may need to be considered under technical capability maybe the need to collect, maintain, transliterate and translate IDN RDS/WHOIS information.	ALAC	
8	We support the adoption of an RSP program. The adoption of such a program ought to enable a Registry Operator to indicate at application or, at any time prior to contract-signing, its chosen RSP provider, on the condition that such provider has been approved by ICANN. Please see our answers in section 1 for more detail on how we see an RSP Program working.	Valideus	

4.3.1.2 - Do you believe that technical evaluation should be done per application, per cluster of similar technical infrastructure of a single applicant entity/group, or per cluster of similar infrastructure among all applicants in a procedure (e.g, consolidate as much as possible)?

#	Comment	Contributor	WG Response
1	Consolidation of the testing would be ideal.	Nominet	
2	If the registry is using a third party RSP, then clustering of the evaluations could be workable.	BC	
3	The BRG concurs with the RySG comments: If a RSP programme is not agreed then the RySG work team is in favour of an approach that would allow evaluation of a registry service platform once, even where it was servicing multiple TLDs. Supplementary, tailored reviews could be conducted for the registry service provider in the event that a particular TLD operating on its platform had materially different requirements such that independent testing and evaluation would be required. Repeating technical evaluations for a single registry service provider does not adequately address concerns around scaling/capacity. This would be better addressed by establishing intermediate thresholds that could trigger re-evaluation if a registry's operational requirements grew without comparable scaling to the platform's capacity.	BRG	

4	Afilias supports the development of a process efficiencies, especially as they relate to the technical evaluation of registry service providers. Further to the response to Question 1.1.2, one dimension of process efficiencies to be considered is the elimination of duplicate technical evaluation of an RSP. Each application would need to be evaluated according to its unique needs, the known capabilities and prior testing results of the selected RSP, and then technical evaluation conducted accordingly.	Afilias
5	If a RSP programme is not agreed then the RySG work team is in favour of an approach that would allow evaluation of a registry service platform once, even where it was servicing multiple TLDs. Supplementary, tailored reviews could be conducted for the registry service provider in the event that a particular TLD operating on its platform had materially different requirements such that independent testing and evaluation would be required. Repeating technical evaluations for a single registry service provider does not adequately address concerns around scaling/capacity. This would be better addressed by establishing intermediate thresholds that could trigger reevaluation if a registry's operational requirements grew without comparable scaling to the platform's capacity.	RySG
6	We agree that evaluation should consolidate as much as possible.	ALAC
7	Aligned with our support of an RSP program, we support the evaluation of similar infrastructure among all applicants as far as possible.	Valideus

4.3.1.2.1 - If consolidated, should the aggregate requirements of applied-for TLDs and currently operated TLDs be taken in consideration for evaluation?		
1	Only bundling within the same application round should be considered.	Jannik Skou
2	Yes.	BRG
3	None of these questions are relevant under the suggested changes to the new gTLDs program I've outlined above.	John Poole
4	Further to Afilias's response to Question 1.1.2, a scalability consideration of an application should consider the operational experience of an existing RSP, including especially experience operating a large infrastructure. Although this past round of applications has empirically shown that not all registries require the same infrastructures, an RSP may have technical infrastructure requirements to be considered that result from the aggregation of TLDs.	Afilias
5	Yes, this should be considered in the financial evaluation portion of the application process.	RySG
6	We agree that there is no reason to bring in new & invasive evaluation of existing TLD operators (both gTLD and ccTLD). One aspect that could be added in the case of currently operated TLDs may be to check on history of quality-of service issues with the applicant which would reflect the technical capability.	ALAC

4.3.2 It is generally agreed that financial stability of a gTLD operator is necessary to ensure the security, stability, and resiliency of the Internet.		
1	While the obvious answer is yes, the presence of an EBERO program makes this a moot question. If registries are not allowed to fail, then their financial stability has no bearing because the TLDs will always be operated by someone, with ICANN being the last resort.	Jim Prendergast
2	A dotBrand is not reliant on revenue from selling domains to maintain its core business, instead, it is budgeted item in support of its core business. The financial assessments were introduced to provide assurance that the business model used would be viable to support the registry in the short to medium term, and minimise the likelihood of failure that would have an adverse impact on its registrants. However, as a dotBrand is not selling domains to support its registry operation, and only itself, its affiliates or TM Licensees are the registrant, this protection is not as necessary. Removing, or at least reducing the requirements for the financial review would reduce the time and resources needed for this type of applicant.	BRG

4.3.2.1 - ICANN sought detailed financial information as it pertains to an applicant's proposed business model, projected revenue, and operating expenses. However, it required such information be provided through a static template rather than allowing applicants to provide their own financial models. Did this present any issues in the 2012 round? Please explain.		
1	Any business model at a similar degree of detail should be allowed. Business models may vary.	Jannik Skou
2	To our knowledge, this did not create a burden on applicants.	Afilias
3	It likely provided more inconvenience for some than it did others, depending on systems and software programs employed, etc. It may be more efficient and convenient for an applicant to provide their own financial information. However, we are unaware of any specific issues regarding the inability to satisfy the requirements of the application by using the ICANN template. This would be a good item for discussion between registry financial officers and ICANN staff.	RySG

4	Operational results from the 2012 round show that the templates demanded (and received) for the round were not realistic. ICANN should concern itself only about availability of funds to maintain the minimum/basic operations in order to keep TLD alive and not anything overly elaborate.	ALAC	
5	Yes. The current model is not appropriate for the .brand registry model, which has a fundamental difference in that it does not have third party registrants. For example, the 2012 template asks for revenue projections for the registry, but as .brands do not sell domains, revenue is not a relevant metric. The purpose of the financial evaluation is to ensure sufficient funding of the registry to guard against registry failure. Notwithstanding the fact that protecting against registry failure should be less of an issue for a registry with no third party registrants, it should be sufficient for .brands to simply demonstrate they have the necessary funds to cover their registry costs. Therefore, a much more simplified version of the 2012 template – requiring just an outline of estimated registry costs and a demonstration of the company's financial position through the provision of company financial statements – would be more appropriate for .brands.	Valideus	

4.3.2.2 - Can financial capability be demonstrated with less detail, in a different manner, or via a different mechanism? Are there details or levels of detail that are unnecessary?

1	No, one should be able to demonstrate the ability to run a business – and providing a solid realistic business plan is an important factor that should be evaluated (Unless a .brand or "public authority operated and sponsored GEO TLD).	Jannik Skou	
2	Yes	BC	
3	See response to 4.3.2.1 – for dotBrands, this can be simplified to demonstrate financial position and designated budget.	BRG	
4	The format provided was not useful for all applicants, specifically the ".brand" TLDs which are not assigning revenue in a traditional sense. These business models could benefit from less detail,	Afilias	
5	Financial statements in the form described in the AGB (question 45) were not relevant for some New gTLDs Applicants such as governments. Applicants should be given the flexibility to submit the documents necessary to demonstrate financial position, e.g. a budget. Where the financial statement or similar document demonstrates, subject to objective criteria, that the New gTLD Applicant has access to funding sufficient to cover the costs of running a registry (e.g. government or established corporation or registry operator), additional demonstration of financial capability such as a detailed explanation of costs/capital expenditures and funding/revenue should not be required.	RySG	
6	The only demonstration needed for financials should be the proof of ability to maintain basic TLD operations and infrastructure.	ALAC	
7	Yes. Please see our answer to 4.3.2.1.	Valideus	

4.3.2.3 - In the prior round, detailed business plans were provided, but not evaluated; they were however used to provide context to evaluators in scoring applicant responses. Do you believe that this information needs to be collected in order to evaluate an applicant's financial capabilities? Please explain? How should changes in business plans during the application process be handled?

1	Changes of business plans after submission of the application should not be evaluated (Time issues and number of competing applications can not be foreseen). But the mere ability to provide a thorough business plan is still important.	Jannik Skou	
2	Yes, business plans should still be provided to justify how the applicant intends to run the TLD. The plans should be relevant to the type of TLD (Brand, Geo, Community, etc).	BC	
3	See response to 4.3.2.1 – for dotBrands, this can be simplified and does not require the submission of a business plan to demonstrate financial capability.	BRG	
4	Given the different uses and business models, a one-size-fits-all for a template and scoring is inappropriate. The primary focus of ICANN should be the financial stability of the applicant and their commitment to the on-going operation of the TLD, and the ability of their back-end registry service provider.	Afilias	
5	Detailed business plan information does not need to be collected in order to evaluate an Applicant's financial capabilities. The evaluation process should require the Applicant to demonstrate financial capability to run a registry and not financial capability to run a particular registry. The costs associated with running a registry can be based on data from the previous New gTLD round and cost guidance previously provided by ICANN; https://www.icann.org/news/announcement-3-2011-12-23-en. Requiring Applicants to describe business plans stifles progress and innovation and is unnecessary for a forward looking assessment of financial capability.	RySG	

6	Business plans presented by applicants in 2012 did not really work. Since there is no penalty for wrong planning, it is unclear why there should be a requirement for financial plans. Therefore, these can be dropped.	ALAC	
7	We supported .brand applicants in the 2012 round. We do not believe that .brands should be required to provide a business plan as part of their application. A company's use of a .brand is for their commercial strategic use, which should not be required to be subject to third party review.	Valideus	
4.3.2.4 - Some have argued that for Brand TLDs that do not rely on the distribution of domains, an evaluation of the business model unnecessary. Do you agree with this assertion? Please explain. Are there any other types of TLDs for which the collection of business models may be unnecessary? Please explain.			
1	Not needed as no public interests are at stake – however, .brands not allowed to change registration policy (i.e. remove restrictions), if they were given priority over a "for-profit" (Open/Restricted) TLD in a contention set. GEO TLDs operated and sponsored by public authorities. Such TLDs will be well funded and also would prefer this project under a budget for say marketing/infrastructure – and with no need for "separated accounts."	Jannik Skou	
2	We agree with the assertion, since the business model of a brand registry is not at-all for-profit, there is no reason why a model needs to exist. A brand applicant should only need to demonstrate that it is able to meet its financial commitments to ICANN.	Demys	
3	Yes. A brand should only need to demonstrate that it is an ongoing concern. The usage of a TLD to add security to a corporate infrastructure by eliminating third parties does not require ICANN to oversee it.	Nominet	
4	Agreed. DotBrands represent a very different model than traditional registries and an evaluation of their business model is unnecessary. Financial position and commitment to a budget to fund the operation of the registry should be entirely sufficient for this purpose. For clarity, any future financial concerns of a company running a dotBrand registry will culminate in the winding down of the company (and therefore the registry), reducing operational costs by closing the registry or sell-on the business – none of which will impact third party registrants (other than themselves, their affiliates and TM Licensees), or the security, stability and resilience of the Internet.	BRG	
5	Yes, we agree that ".brands" have a different business model and should have a more streamlined review process. As noted above in 4.3.2.2, ".brands" potentially have different business models and would not have a traditional revenue stream. With these, the primary focus of ICANN should be the financial stability of the applicant and their commitment to the on-going operation of the TLD, and the ability of their back-end registry service provider.	Afilias	
6	No. Even if an applicant intends to run a brand TLD, likely with far fewer second-level registrations than a generic TLD, its request for admission to the root should be accompanied by a thorough demonstration that it is financially capable of holding the TLD to the security and stability standards required of all other applicants.	RySG	
7	We agree that .brand applicants should not be required to submit a business plan with their applications, since all domains in the TLD will be for private use of the applicant and their affiliates.	Valideus	
4.3.2.5 - Do you believe that financial capability should be demonstrated at application time, or could it be demonstrated at, or just before, contract-signing time? Or at both times? Please explain.			
1	Should be evaluated based on ability to operate/fund all TLDs applied for.	Jannik Skou	
2	Continuing evaluation of financial capability should be in place.	BC	
3	The BRG concurs with the RySG comments: This might depend on the time elapsed between application and contracting. If it's significant and, say, a potential applicant failed to meet certain criteria but remained eligible as an applicant, a second review could be warranted. However, it would be critical not to penalize an applicant with a second demonstration because of delay on ICANN's part, or on foot-dragging by others in the community.	BRG	
4	Afilias concurs with the opinions of the RySG and defers to that response.	Afilias	
5	This might depend on the time elapsed between application and contracting. If it's significant and, say, a potential applicant failed to meet certain criteria but remained eligible as an applicant, a second review could be warranted. However, it would be critical not to penalize an applicant with a second demonstration because of delay on ICANN's part, or on foot-dragging by others in the community.	RySG	

6	At application time. However, an issue in the 2012 round was the long time it took between application submission and delegation of TLDs, meaning that financial positions of applicants had changed. It is therefore important that the process of evaluating and delegating TLDs in subsequent rounds is significantly improved and made more efficient.	Valideus	
4.3.2.6 - Do you believe that financial evaluation should be done per application or per possible registry family assuming all applied-for strings are won?			
1	Per application as operation of strings within a family varies.	Jim Prendergast	
2	The BRG concurs with the RySG comments:This too depends on the approach taken by the registry. But generally, the latter.	BRG	
3	Financial evaluation should be done on an individual application basis.	Afilias	
4	This too depends on the approach taken by the registry. But generally, the latter.	RySG	
5	Per registry family, if the applicant requests it (some may wish to treat the TLDs separately).	Valideus	
4.3.2.7 - Given the international nature of ICANN and its outreach to less developed areas, is the one size fits all approach to financial evaluation appropriate?			
1	YES (Apart from .BRANDs and GEO public authority operated and sponsored TLDs) – as "registry origin" can be gamed.	Jannik Skou	
2	Apart from the different types of models that may create variations in financial evaluations, the financial evaluations should meet the same standard.	BRG	
3	None of these questions are relevant under the suggested changes to the new gTLDs program I've outlined above.	John Poole	
4	The country of origin of an application is irrelevant for measuring financial capability. The only differences in financial evaluation to be considered is for a ".brand" that does not have a traditional revenue model.	Afilias	
5	Yes. Applicants should meet the same standard.	RySG	
6	Please see our answer to 4.3.2.1 with regard to .brands. Other than .brands, we see no reason to further differentiate the financial evaluation for other applicants/TLDs. Note that this does not preclude the Applicant Support Program from having a role to play in assisting applicants from less developed areas.	Valideus	
4.3.3.1 - What suggestions do you have for improving the application evaluation process that you would like the community to consider?			
1	Bundling of applications AND that a written evaluation – not just scoring – is provided to applicant. Drop COI, Drop Community TLDs, Make entire application including Q18 binding. No criminal background checks for GEO (publically driven) or any applicant listed on a stock exchange.	Jannik Skou	
2	There should be more continuity in dealing with applications with the same registry as there was a lot of duplication and repetition of tasks in the assessments in the previous round.	Nominet	
3	In general, we feel the review must continue to give emphasis on technical measures as noted throughout this response.	Afilias	
4	The PDP WG should review the desirability of a continuous and rigorous vetting process for applicants during the prolonged period of application, evaluation and delegation when ownership and lead persons for the application may change, with the aim of avoiding any possible risk of criminality gaining a foothold in the domain name system.	GAC UK	
5	With regard to the Continued Operations Instrument, ICANN should ensure that a template for a compliant LOC is made available to the applicant community which takes account of local financial and legal requirements in different parts of the world.	Valideus	
4.3.2.5 - Do you believe that financial capability should be demonstrated at application time, or could it be demonstrated at, or just before, contract-signing time? Or at both times? Please explain.			

Community Comment 2		
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4.4 Name Collisions		
#	Comment	Contributor	WG Response
	4.4.1 - What general guidance for namespace collisions would you like the community to consider for subsequent procedures, and why?		
1	Many terms that were included in the name collision list in the First Round included trademarked terms, and terms that were registered in the TMCH. This resulted in many brand owners being unable to register domain names that included their brands during Sunrise periods, and after. In retrospect, it is questionable as to the value these terms had in being included within the Name INTA Submission Page 11 Collision list, and the detriment to brand owners and the New gTLD program was not insignificant. Many of these blocked domains had a deleterious effect on planned marketing campaigns early in the life of new gTLDs, and raised questions as to their value with marketers. Further uncertainty occurred as these names were released from Name Collision, as registries were unsure as to whether the names should be offered in a 2nd Sunrise Period. Should there be a 2nd Name Collision exercise, INTA urges for ICANN to (a) consider not including names registered in the TMCH on such lists, and/or (b) provide registries a clear process with which to release these names under additional Sunrise periods.	INTA	

See SAC045: Invalid Top Level Domain Queries at the Root Level of the Domain Name System (15 November 2010 with corrections) at: https://www.icann.org/en/groups/ssac/documents/sac-045-en.pdf
Board Advice Status: CLOSED
See Board Advice Status Report and Definitions at: https://www.icann.org/en/system/files/files/board-advice-status-report-pdf-30apr17-en.pdf and https://features.icann.org/board-advice
Recommendation (2): The SSAC recommends that ICANN consider the following in the context of the new gTLD program.
• Prohibit the delegation of certain TLD strings. RFC 2606, "Reserved Top Level Domain Names," currently prohibits a list of strings, including test, example, invalid, and localhost. ICANN should coordinate with the community to identify a more complete set of principles than the amount of traffic observed at the root as invalid queries as the basis for prohibiting the delegation of additional strings to those already identified in RFC 2606.
• Alert the applicant during the string evaluation process about the pre-existence of invalid TLD queries to the applicant's string. ICANN should coordinate with the community to identify a threshold of traffic observed at the root as the basis for such notification. Define circumstances where a previously delegated string may be re-used, or prohibit the practice.

See SAC062: SSAC Advisory Concerning the Mitigation of Name Collision Risk (07 November 2013) at: https://www.icann.org/en/groups/ssac/documents/sac-062-en.pdf
Board Advice Status: OPEN – UNDER REVIEW
See Board Advice Status Report and Definitions at: https://www.icann.org/en/system/files/files/board-advice-status-report-pdf-30apr17-en.pdf and https://features.icann.org/board-advice
Recommendation 1: ICANN should work with the wider Internet community, including at least the IAB and the IETF, to identify (1) what strings are appropriate to reserve for private namespace use and (2) what type of private namespace use is appropriate (i.e., at the TLD level only or at any additional lower level).
Recommendation 2: ICANN should explicitly consider the following questions regarding trial delegation and clearly articulate what choices have been made and why as part of its decision as to whether or not to delegate any TLD on a trial basis:
• Purpose of the trial: What type of trial is to be conducted? What data are to be collected?
• Operation of the trial: Should ICANN (or a designated agent) operate the trial or should the applicant operate it?
• Emergency Rollback: What are the emergency rollback decision and execution procedures for any delegation in the root, and have the root zone partners exercised these capabilities?
• Termination of the trial: What are the criteria for terminating the trial (both normal and emergency criteria)? What is to be done with the data collected? Who makes the decision on what the next step in the delegation process is?
Recommendation 3: ICANN should explicitly consider under what circumstances un-delegation of a TLD is the appropriate mitigation for a security or stability issue. In the case where a TLD has an established namespace, ICANN should clearly identify why the risk and harm of the TLD remaining in the root zone is greater than the risk and harm of removing a viable and in-use namespace from the DNS. Finally, ICANN should work in consultation with the community, in particular the root zone management partners, to create additional processes or update existing processes to accommodate the potential need for rapid reversal of the delegation of a TLD.
Root Server System Monitoring: The SSAC notes the NGPC decision recommends to the ICANN Board that:

"…it direct the ICANN President and CEO to develop a long term plan to manage name collision risks related to the delegation of new TLDs, and to work with the community to develop a long-term plan to retain and measure root-server data."

The SSAC supports this recommendation and views it as consistent with previous SSAC recommendations to establish measurement, monitoring and data sharing capability for the root server system. Additionally, the SSAC believes that such a capability must be defined and deployed promptly. The capability must be sufficiently flexible to accommodate additional data that might need to be collected and analyzed for name conflict/avoidance as well as other future requirements.

Furthermore, the establishment of instrumentation capabilities across the root server system in order to collect longer-term data regarding applied-for strings and other content-level behaviors going forward would be of clear benefit.

See SAC066: SSAC Comment Concerning JAS Phase One Report on Mitigating the Risk of DNS Namespace Collisions (06 June 2014) at: https://www.icann.org/en/system/files/files/sac-066-en.pdf
Board Advice Status: CLOSED

3	When presented with advice from the SSAC, ICANN should act on it in a timely manner. The issue of Name Collisions was raised by the SSAC in 2010. (SAC045) The ICANN Board and staff had years to deal with this prior to the opening of the application window but they chose not to. This decision had significant impacts on the rollout of the 2012, many of which were avoidable.	Jim Prendergast
4	The BRG concurs with the RySG comments: The timing of the introduction of name collisions as a concern for new gTLDs during the 2012 round of the Program was extremely disruptive and caused significant delays to the process of delegating new gTLDs while ICANN assessed the issue and considered proposals to mitigate against the risk. In subsequent new gTLD procedures, if name collision is deemed to be a continuing risk that requires mitigation, a clear and fair process for determining which strings will pose a risk for Name Collision should be developed and communicated to future applicants well in advance of any subsequent application procedures. If a similar risk mitigation procedure is deemed to be appropriate, applicants should be made aware in advance so that they have the opportunity to factor controlled interruption periods into their launch timelines.	BRG
5	Afilias concurs with the opinions of the RySG and defers to that response.	Afilias
6	The timing of the introduction of name collisions as a concern for new gTLDs during the 2012 round of the Program was extremely disruptive and caused significant delays to the process of delegating new gTLDs while ICANN assessed the issue and considered proposals to mitigate against the risk. In subsequent new gTLD procedures, if name collision is deemed to be a continuing risk that requires mitigation, a clear and fair process for determining which strings will pose a risk for Name Collision should be developed and communicated to future applicants well in advance of any subsequent application procedures. If a similar risk mitigation procedure is deemed to be appropriate, applicants should be made aware in advance so that they have the opportunity to factor controlled interruption periods into their launch timelines.	RySG
7	In general, no new risks or failure modalities are expected vis-a-vis name collisions. Consequently, the existing policy safeguards may be sufficient.	ALAC
	4.4.2 - Were there non-applied for strings that would fall into a high risk category that you would suggest not be allowed in subsequent procedures? If yes, which ones and why? Should a Name Collision based evaluation be incorporated into the process for subsequent procedures? What data sources could/should be used for analyzing namespace collisions for subsequent procedures?	
1	Delegation and wildcard NC testing should be done prior to RA (with no right to register second level domains) – to gain time and avoid conflicts with SR periods etc.	Jannik Skou

See SAC045: Invalid Top Level Domain Queries at the Root Level of the Domain Name System (15 November 2010 with corrections) at: https://www.icann.org/en/groups/ssac/documents/sac-045-en.pdf

Board Advice Status: CLOSED

See Board Advice Status Report and Definitions at: https://www.icann.org/en/system/files/files/board-advice-status-report-pdf-30apr17-en.pdf and https://features.icann.org/board-advice

Recommendation (2): The SSAC recommends that ICANN consider the following in the context of the new gTLD program.

• Prohibit the delegation of certain TLD strings. RFC 2606, "Reserved Top Level Domain Names," currently prohibits a list of strings, including test, example, invalid, and localhost. ICANN should coordinate with the community to identify a more complete set of principles than the amount of traffic observed at the root as invalid queries as the basis for prohibiting the delegation of additional strings to those already identified in RFC 2606.

• Alert the applicant during the string evaluation process about the pre-existence of invalid TLD queries to the applicant's string. ICANN should coordinate with the community to identify a threshold of traffic observed at the root as the basis for such notification. Define circumstances where a previously delegated string may be re-used, or prohibit the practice.

See SAC062: SSAC Advisory Concerning the Mitigation of Name Collision Risk (07 November 2013) at: https://www.icann.org/en/groups/ssac/documents/sac-062-en.pdf

Board Advice Status: OPEN – UNDER REVIEW

See Board Advice Status Report and Definitions at: https://www.icann.org/en/system/files/files/board-advice-status-report-pdf-30apr17-en.pdf and https://features.icann.org/board-advice

Recommendation 1: ICANN should work with the wider Internet community, including at least the IAB and the IETF, to identify (1) what strings are appropriate to reserve for private namespace use and (2) what type of private namespace use is appropriate (i.e., at the TLD level only or at any additional lower level).

Recommendation 2: ICANN should explicitly consider the following questions regarding trial delegation and clearly articulate what choices have been made and why as part of its decision as to whether or not to delegate any TLD on a trial basis:

• Purpose of the trial: What type of trial is to be conducted? What data are to be collected?

• Operation of the trial: Should ICANN (or a designated agent) operate the trial or should the applicant operate it?

• Emergency Rollback: What are the emergency rollback decision and execution procedures for any delegation in the root, and have the root zone partners exercised these capabilities?

• Termination of the trial: What are the criteria for terminating the trial (both normal and emergency criteria)? What is to be done with the data collected? Who makes the decision on what the next step in the delegation process is?

Recommendation 3: ICANN should explicitly consider under what circumstances un-delegation of a TLD is the appropriate mitigation for a security or stability issue. In the case where a TLD has an established namespace, ICANN should clearly identify why the risk and harm of the TLD remaining in the root zone is greater than the risk and harm of removing a viable and in-use namespace from the DNS. Finally, ICANN should work in consultation with the community, in particular the root zone management partners, to create additional processes or update existing processes to accommodate the potential need for rapid reversal of the delegation of a TLD.

Root Server System Monitoring: The SSAC notes the NGPC decision recommends to the ICANN Board that:

"…it direct the ICANN President and CEO to develop a long term plan to manage name collision risks related to the delegation of new TLDs, and to work with the community to develop a long-term plan to retain and measure root-server data."

The SSAC supports this recommendation and views it as consistent with previous SSAC recommendations to establish measurement, monitoring and data sharing capability for the root server system. Additionally, the SSAC believes that such a capability must be defined and deployed promptly. The capability must be sufficiently flexible to accommodate additional data that might need to be collected and analyzed for name conflict/avoidance as well as other future requirements.

Furthermore, the establishment of instrumentation capabilities across the root server system in order to collect longer-term data regarding applied-for strings and other content-level behaviors going forward would be of clear benefit.

See SAC066: SSAC Comment Concerning JAS Phase One Report on Mitigating the Risk of DNS Namespace Collisions (06 June 2014) at: https://www.icann.org/en/system/files/files/sac-066-en.pdf

Board Advice Status: CLOSED

3	The BRG concurs with the RySG comments: The 2013 "Name Collision in the DNS" report by Interisle Consulting Group served as the basis for ICANN's understanding of the potential risks posed by name collision and ultimately led to the development of a mitigation framework. Interisle based its report on "Day in the Life" (DITL) data, or the stream of DNS requests to certain root servers and servers operated by a global DNS resolver organization for two, three-day periods, one in 2013 and one in 2012. It counted individual requests for each gTLD string to determine the level of risk each string presented in terms of collisions. However, the report failed to put into context which of these requests actually presented a concrete collision threat, and which were harmless, which likely served to overstate the potential for risk for certain strings. At this point, the RySG is not in a position to determine whether specific potential strings should be withheld from registration due to their risk for name collision. If a name collision risk assessment will be part of the evaluation of future gTLD applications, the RySG urges ICANN to work to identify a more rigorous methodology that not only quantifies the number of requests, but is able to provide a more nuanced and detailed assessment of what, if any, real threat is posed by the applied-for string.	BRG	
4	[Were there non-applied for strings that would fall into a high risk category that you would suggest not be allowed in subsequent procedures?] Of course there are such strings-- DO NOT ALLOW ANY [Should a Name Collision based evaluation be incorporated into the process for subsequent procedures?] OF COURSE – this is common sense—you need a survey to ask this question? [What data sources could/should be used for analyzing namespace collisions for subsequent procedures?] If GNSO is clueless, then don't add ANY more new gTLDs to the mess we already have.	John Poole	
5	Afilias concurs with the opinions of the RySG and defers to that response.	Afilias	
6	The 2013 "Name Collision in the DNS" report by Interisle Consulting Group served as the basis for ICANN's understanding of the potential risks posed by name collision and ultimately led to the development of a mitigation framework. Interisle based its report on "Day in the Life" (DITL) data, or the stream of DNS requests to certain root servers and servers operated by a global DNS resolver organization for two, three-day periods, one in 2013 and one in 2012. It counted individual requests for each gTLD string to determine the level of risk each string presented in terms of collisions. However, the report failed to put into context which of these requests actually presented a concrete collision threat, and which were harmless, which likely served to overstate the potential for risk for certain strings. At this point, the RySG is not in a position to determine whether specific potential strings should be withheld from registration due to their risk for name collision. If a name collision risk assessment will be part of the evaluation of future gTLD applications, the RySG urges ICANN to work to identify a more rigorous methodology that not only quantifies the number of requests, but is able to provide a more nuanced and detailed assessment of what, if any, real threat is posed by the applied-for string.	RySG	
	4.4.3 - Based on data from the first round, can the controlled interruption period be reduced in future rounds?		
1	The BRG concurs with the RySG comments: Considering that there were very low instances of name-collision problems reported during the introduction of new gTLDs from the 2012 round, the RySG believes that the controlled interruption period can be reduced to 60 days or fewer.	BRG	
2	No.	John Poole	
3	Afilias concurs with the opinions of the RySG and defers to that response.	Afilias	
4	Considering that there were very low instances of name-collision problems reported during the introduction of new gTLDs from the 2012 round, the RySG believes that the controlled interruption period can be reduced to 60 days or fewer.	RySG	
	4.4.4 - Should any measures be suggested or requested from TLDs that already ended or will end their emergency readiness after two years of delegation? Are any measures needed for gTLDs delegated prior to the 2012 round?		
1	No	BRG	
2	None of these questions are relevant under the suggested changes to the new gTLDs program I've outlined above.	John Poole	
3	Afilias concurs with the opinions of the RySG and defers to that response.	Afilias	
4	No.	RySG	

Community Comment 2		
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4.5 Security and Stability			
#	Comment	Contributor	WG Response
4.5.1 Considering that, different from the 2012-round, we now have Top-Level Label Generation Rules available for most, if not all, scripts and languages, does the per-label security and stability review still makes sense?			
1	See SAC084: SSAC Comments on Guidelines for the Extended Process Similarity Review Panel for the IDN ccTLD Fast Track Process (31 August 2016) at: https://www.icann.org/en/system/files/files/sac-084-en.pdf Board Advice Status: OPEN – UNDER REVIEW See Board Advice Status Report and Definitions at: https://www.icann.org/en/system/files/files/board-advice-status-report-pdf-30apr17-en.pdf and https://features.icann.org/board-advice Design Principles: Request for Comment (RFC) 6912, "Principles for Unicode Code Point Inclusion in Labels in the DNS," describes "…a set of principles that can be used to guide the decision of whether a Unicode code point may be wisely included in the repertoire of permissible code points in a U-label in a zone." The SSAC believes that some of these principles, as restated below, also apply to decisions concerning the inclusion of IDN labels in the root zone: Conservatism Principle: Because the root zone of the global DNS is a shared resource, the decision to add a label to the root should be governed by a conservative bias in favor of minimizing the risk to users (regardless of the language or script they are using and whether the label will be a gTLD or a ccTLD) and minimizing the potential for the need to make decisions that later must be changed or overridden in painful or incompatible ways. In order to minimize risk, doubts should always be resolved in favor of rejecting a label for inclusion rather than in favor of including it. Inclusion Principle: A TLD label should be added to the root zone only if it is known to be "safe" in terms of usability and confusability. This is particularly important for labels whose form as normally presented to a user contains non-ASCII characters because the number and kinds of possibilities for usability and confusability problems is much greater. Stability Principle: The list of permitted labels in the root zone should change at a rate that does not negatively impact the stability of the root of the DNS, and usually only in the direction of permitting an addition as time and experience indicate that inclusion of such a TLD label is both safe and consistent with these principles. These principles have been reflected in ICANN IDN guidelines that have been in place for more than a decade, in past SSAC advisories on IDNs, in input documents to ICANN's Root Zone Label Generation Rules (LGRs), and as overall principles for the IDN ccNSO Policy Development Process. The conservatism principle was also a cornerstone to the IDN ccTLD Fast Track Process. Adherence to these principles is critical for the continued interoperability and stability of the DNS root zone and deviation would increase the risk of root zone instability.	SSAC	
2	Yes.	John Poole	
3	Afilias supports the application of the design principles described in SAC084 "SSAC Comments on Guidelines for the Extended Process Similarity Review Panel for the IDN ccTLD Fast Track process" in the consideration of all IDNs.	Afilias	
4	We believe a per-label security and stability review does not make sense anymore, with two very limited exceptions: ● 1-char IDNs ● Scripts and/or languages for which there are no top-level LGRs at time of application	RySG	
5	In general, per-label review may not be required.	ALAC	
4.5.2 Considering the already published CDAR study and comments to that study, do you have any comments regarding root zone scaling?			

1	The BRG concurs with the RySG comments: The RySG is pleased that the root DNS system has been able to handle the increase in root server traffic observed between January 2014 and January 2016, which was approximately threefold. Considering that only 0.4% of the queries received by the root servers are for new gTLDs, we infer that there is no strong correlation between increase of the root zone size and root servers query load. In fact, making the root zone larger could have contributed to limit the growth of overall traffic to the root servers because of differences in behavior between positive and negative caching. First, positive answers have a larger TTL (Time To Live) than answers of non-existence, and second, as demonstrated in previous analysis of queries to recursive servers versus root servers, negative caching is applicable only to specific host names whereas positive caching applies to an entire TLD. The RySG is of the opinion that the cautious approach of gradually delegating new gTLDs was the right choice and advises also in future rounds to exercise care and keep the DNS evolving in a healthy way. As experience with the root server system grows, the increased root server system monitoring capabilities should be used as guidance to whether a ceiling is in effect required and what that ceiling should be. We strongly disagree with pre determining a ceiling to the delegation rate of TLDs.	BRG	
2	See SSAC Letter to the ICANN Board on the New Generic Top Level Domain (gTLD) Process (02 July 2012) at: https://www.icann.org/en/news/correspondence/faltstrom-to-icann-board-02jul12-en.pdf Board Advice Status: NOT LISTED IN THE BOARD ADVICE TABLE. To: ICANN Board From: Security and Stability Advisory Committee (SSAC) Via: SSAC Liaison to the ICANN Board Subject: The New Generic Top Level Domain (gTLD) Process This letter provides an update on the SSAC's views on the status of the new gTLD process and takes note of concerns expressed by other ICANN organizations. In particular, we have examined the letter from the Chair of the Governmental Advisory Committee (GAC) to the Chair of the Board of ICANN, dated 17 June 2012. We believe there are at least three distinct issues to be considered. First, the SSAC does not have any formal view with respect to the issue of batching the review of applications. We do not believe a process for ordering applications bears upon the security and stability of the Internet. Second, the SSAC believes that questions regarding the maximum number of new TLDs that can be added to the root zone are misplaced. The proper concern is to ensure that the overall root zone publication system is audited and monitored to confirm that its resources can support an increase without degradation in the current service level. Third, "SAC 042 – SSAC Comment on the Root Scaling Study Team Report and the TNO Report" noted concerns with a potential combinatorial effect of adding Internet Protocol Version 6 (IPv6), DNS Security Extensions (DNSSEC), and new gTLDs to the root zone at essentially the same time. Since IPv6 and DNSSEC records have already been added to the root zone, the SSAC does not now believe the combinatorial issue is a concern. In addition, we would like to reiterate and emphasize the recommendations of "SAC 046 - Report of the Security and Stability Advisory Committee on Root Scaling":	SSAC	
3	CDAR study hardly reassuring.	John Poole	
4	Afilias supports the recommendations of the "Continuous Data-driven Analysis of Root Stability Deliverable D2: Root Stability Report".	Afilias	

5	The RySG is pleased that the root DNS system has been able to handle the increase in root server traffic observed between January 2014 and January 2016, which was approximately threefold. Considering that only 0.4% of the queries received by the root servers are for new gTLDs, we infer that there is no strong correlation between increase of the root zone size and root servers query load. In fact, making the root zone larger could have contributed to limit the growth of overall traffic to the root servers because of differences in behavior between positive and negative caching. First, positive answers have a larger TTL (Time To Live) than answers of non-existence, and second, as demonstrated in previous analysis of queries to recursive servers versus root servers, negative caching is applicable only to specific host names whereas positive caching applies to an entire TLD. The RySG is of the opinion that the cautious approach of gradually delegating new gTLDs was the right choice and advises also in future rounds to exercise care and keep the DNS evolving in a healthy way. As experience with the root server system grows, the increased root server system monitoring capabilities should be used as guidance to whether a ceiling is in effect required and what that ceiling should be. We strongly disagree with pre determining a ceiling to the delegation rate of TLDs.	RySG	
6	The diversity of the root system can handle the additional load caused by "normal" new TLDs through the usual scaling up process followed by root server operators, assuming that names are gradually delegated. For special TLDs (which prove to be very successful in driving DNS traffic), additional measures may be required to maintain stability.	ALAC	