

## CC2 Section 4 - IDNs

### 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)?

Nominet, BRG, RySG, ALAC, and Valideus supported 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.

Sample excerpts:

“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, BRG

“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

“Provided such TLDs are subject to all the usual string confusion mitigation and legal rights principles we believe they should be allowed.” -- Valideus

SSAC (see SAC052) recommended specific measures with respect to single-character IDN TLDs, which Aflias also supported.

Excerpt:

“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: . . ." – SSAC, Aflias

John Poole did not support allowing 1-char IDN TLDs.

#### **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?**

RySG expressed that existing policies are sufficient in this area.

Excerpt:

"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

Aflias expressed support for recommendations included in SAC060 "SSAC Comment on Examining the User Experience Implications of Active Variant TLDs Report" and 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.

ALAC and John Poole pointed to additional areas for policy work on IDNs.

Sample excerpts:

"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

"IDNs should be primarily ccTLDs when they concern a language predominantly limited to a single nation (see RFC 1591)." – John Poole

**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?**

RySG and Jannik Skou supported the concept of bundling.

Sample excerpts:

“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

“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

Nominet supported allowing different business models.

Sample excerpt:

“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

ALAC recommended addressing this issue through participatory processes, offered additional considerations regarding bundling, and suggested measures to support stability and resilience.

“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

John Poole supported addressing this issue prior to subsequent procedures.

#### **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?**

ALAC, Afilias, and John Poole supported harmonization.

Sample excerpts:

“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

“The process for considering and introducing 10character IDNs should be consistent with and no more restrictive than the ccTLD fast track guidelines.” – Afilias

“IDNs should primarily be ccTLDs where possible, but consistent policy affecting both ccTLDs and gTLDs is appropriate.” – John Poole

RySG expressed that is not within the remit of the GNSO to comment of ccNSO policy.

Excerpt:

“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

SSAC referenced recommendations and comments included in SAC060, SAC084, and SAC089.

(staff note: WT members are encouraged to read the full text of the SSAC comment at [https://docs.google.com/spreadsheets/d/1rH2Moiy\\_mNKh74-ihM74dXWJtcLGZjmbwFnQdVdGjEo/edit#gid=1832032264](https://docs.google.com/spreadsheets/d/1rH2Moiy_mNKh74-ihM74dXWJtcLGZjmbwFnQdVdGjEo/edit#gid=1832032264))

## **CC2 Section 4 – Universal Acceptance**

**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/>) ?**

BRG, RySG, and Valideus did not see UA issues that require policy work.

Sample excerpt:

“No. However, new applicants should be made aware of the existing types of issues in advance of their application.” – BRG

John Poole expressed that additional policy work is needed.

Excerpt:

“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. . .” – John Poole

BC supported including registry behavior regarding TLD abuse under the issue of Universal Acceptance.

“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

Afilias and ALAC pointed to initiatives making important contributions on this topic.

“Afilias supports the work of the Universal Acceptance Steering Group.” – Afilias

“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