Fast Track IDN Implementation Draft Statement

Draft Comments on IDN ccTLD Fast Track Draft Implementation Plan v.0.2 (4 November 2008)

The At-Large community is inspired that the long-awaited fast-track IDN ccTLDs will finally be implemented in a foreseeable future. ALAC has been very active in each step of fast-track policy development independently or within the cross-constituency IDNC. With respect to the newly released Implementation Plan, we have the following comments:

I. Expedition and Transparency

The salient purpose of the fast-track implementation is to meet the pressing needs of the IDN users communities. For this purpose, we do hope the process could be sufficiently fast and transparent. From the published Plan, we cannot see a very clear implementation time line. Based on the ICANN Strategic Plan (2009-2012) published on 20 October 2008 and discussion on the Public Forum on 3 November 2008, it seems that the fast-track process will not be done at the root level until mid-2009. It is still unclear when the application around will be launched. The user communities hope that such critical information can be available as soon as possible.

II. Consumer Protection and Market Competition

The Implementation Plan does not specify whether the IDN ccTLD registries are required to take any preventive or transitional measures to protect the legitimate interests of the existing individual registrants under the relevant ccTLDs. Since the individual registrants are most probably not as resourceful as the business sector, they would not afford the expensive lawyering or litigation. The IDN registries' preventive or transitional measures would be essential for them. Market competition can make the prices more reasonable and the services quality better. The user communities welcome to strengthen the competition in the IDN ccTLD registration market provided that IANA process is properly followed and the stability and security are ensured in the relevant name space.

III. Compliance of Community Services

ccTLD Community has been emphasizing that serving the local Internet community is an important feature that makes the ccTLDs different from the gTLDs. The user community notes from the Implementation Plan that the Support from the relevant script community for the IDN table is required for evaluation among the
other documentation of endorsement. The IANA Procedure for Delegation or Redelegation of ccTLDs, also clearly requires that relevant ccTLD delegation or redelegation request show how it will serve the local interest in the country. In the case of an IDN ccTLD, the local interest would be more specific.

Apparently, the ccTLDs need the support of the local user community for the fast-track application and implementation. And, vice versa. It is in the mutual interest of both the IDN ccTLD registry community and the local IDN user community to keep a very close, cooperative and supportive relationship. Presently, some ccTLD registries have already been supportive to the local user organizations in various ways. The outstanding examples are healthy interaction and collaboration between the ccTLDs (such as .br and .au) and local ALSes on policy consultations and community services. The launch of IDN ccTLDs opens up new opportunities for both community. If we take translation as an example, we can see the great potential coming up. The IDN ccTLDs demonstrate the registries have the relevant capacity to provide the services in local scripts. Then, it would be reasonable for the local user community to rely on the registries to translate the ICANN policies and other documents into the local languages. Enhancement of public participation is one of the goals of the ICANN's s Strategic Plan and mandate of the new Public Participation Committee. However, the ICANN centralized funding model for public participation is encountering the bottleneck. In contract, the localized **distributive** funding model through IDN ccTLDs would improve efficiency through linking up the ICANN with its different constituencies and ensure the sustainability of the resources. With respect to ICANN, the clauses on community services should be incorporated and enforced in the IDN ccTLD delegation agreements. Also,ICANN should take the IDN ccTLD's community services or contribution as the valid contribution to the ICANN as stated in the Implementation Plan so that all the stakeholders would have the momentum to develop the system. We also hope that the community-based gTLDs could take the similar path to consolidate the connection with the user community.