

At-Large IDN Variant TLD Program – Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels – Second Public Comment Draft Workspace

Comment Close Date	Statement Name	Status	Assignee (s) and RALO(s)	Call for Comments	Call for Comments Close	Vote Announcement	Vote Open	Vote Reminder	Vote Close	Date of Submission	Staff Contact and Email	Statement Number
06.01.2012	IDN Variant TLD Program – Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels – Second Public Comment Draft	Adopted 13Y, ON, OA	- Edmon Chung (APRA LO) - Rinalia Abdul Rahim (APRA LO)	07.01.2013	13.01.2013	16.01.2013	16.01.2013	21.01.2013	22.01.2013 12:00 UTC	22.01.2013 23:59 UTC	Francisco Arias francisco.arias@icann.org	AL/ALAC/ST /0113/4

Comment/Reply Periods (*)		Important Information Links
Comment Open:	7 December 2012	
Comment Close:	6 January 2013	
Close Time (UTC):	23:59	Public Comment Announcement
Reply Open:	7 January 2013	To Submit Your Comments (Forum)
Reply Close:	27 January 2013	View Comments Submitted
Close Time (UTC):	23:59	Report of Public Comments

Brief Overview

Originating Organization:	ICANN		
Categories/Tags:	Top-Level Domains		
Purpose (Brief):	To receive community feedback on the latest draft of the " Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels – Second Public Comment Draft " [PDF, 790 KB]		
Current Status:	The IDN Variant TLD Program includes a project to establish the Label Generation Rules (LGR) Process for the DNS Root Zone. The project team includes expert consultants and a global team of volunteers. The project team has created new draft document and seeks a second round of community comment and input on the proposed process.		
Next Steps:	The Label Generation Rules (LGR) Procedure document will be updated and published for implementation in the next phase of the IDN Variant TLD Program.		
Staff Contact:	Francisco Arias	Email:	francisco.arias@icann.org

Detailed Information

Section I: Description, Explanation, and Purpose

The IDN Variant TLD Program has been exploring the issues associated with the potential inclusion of IDN variant TLDs in the DNS root zone at the request of the ICANN Board and the community.

The Label Generation Rules Procedure is a way to develop and maintain the Label Generation Rules for the Root Zone in respect of IDNA labels. This procedure must be in place to enable the delegation and management of IDN Variant TLDs.

The IDN Variant TLD Program follows on from the publication of the final Integrated Issues Report on 17 February 2012. [The Program Plan](#) [PDF, 576 KB] was published after two rounds of public comment. The Label Generation Rules (LGR) project team was formed to include expert consultants and a global team of volunteers.

After discussions on-line and a two-day face-to-face session in Los Angeles in August, the project team created a first draft of the document on the "Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels". That draft was published for Public Comment, and the project team received community input on the LGR process and the principles that support it during September and October 2012.

The team continued the refinement of the procedure document, and after a second two-day face-to-face session at the ICANN Toronto Meeting, two additional teleconferences, and daily e-mail discussion with the global team of volunteers, a new draft of the procedure document is now ready for the second and final round of Public Comment.

Section II: Background

On 20 April 2011, ICANN announced the IDN Variant Issues Project to explore the issues associated with the potential inclusion of IDN variant TLDs in the DNS root zone. This project was initiated in response to a [2010 ICANN Board of Directors resolution](#). The project completed with the publication of the final Integrated Issues Report on 17 February 2012.

The IDN Variant TLD Program follows on from that work. The Program consists of several projects, and continues as a multi-phase multi-year program. The Program Plan was published – after substantial public input and comment – on 23 August 2012.

One of the first projects in the new program is to develop the Label Generation Rules (LGR) Process for the DNS Root Zone. The approach taken was to form a project team of expert consultants supported by a global group of volunteers representing multiple scripts and languages. The formation of the volunteer group was announced on 23 August 2012.

The project team has had multiple discussions on-line and by telephone conference, and held two two-day face-to-face sessions. The project team has created a new draft document on the "Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels" for Public Comment, and now seeks community input and comment.

Section III: Document and Resource Links

[Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels – Second Public Comment Draft](#) [PDF, 790 KB]

[Integrated Issues Report](#) [PDF, 2.15 MB]

[Program Plan](#) [PDF, 576 KB]

Section IV: Additional Information

None

(*) *Comments submitted after the posted Close Date/Time are not guaranteed to be considered in any final summary, analysis, reporting, or decision-making that takes place once this period lapses.*

FINAL VERSION TO BE SUBMITTED IF RATIFIED

Please [click here](#) to download a copy of the PDF below.

FINAL DRAFT VERSION TO BE VOTED UPON BY THE ALAC

Acknowledgment of Project 2.1 Team Achievement

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

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

The 2-Panel Process and Effective Outreach

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

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

Limited Supply of Global Experts for the Integration Panel

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

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

Governance Oversight and the Public Comments Process

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

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

Enabling Policies

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

Communicating Convergence Effectively

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

Summary of ALAC Recommendations

The ALAC:

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

FIRST DRAFT SUBMITTED

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