



7 October 2013

Dr Steve Crocker, Chair, ICANN Board

Dear Steve,

GNSO Council response to request for further input & guidance

The GNSO is writing this letter in response to the ICANN Board resolution of 11 April 2013 (<http://www.icann.org/en/groups/board/documents/resolutions-11apr13-en.htm#2.a>), requesting that “ ... interested Supporting Organizations and Advisory Committees provide staff with any input and guidance they may have to be factored into implementation of the Recommendations”.

First, reading from the IDN Variant TLD reports, we understand that IDN Variant TLD allocation and delegation is not purely a technical undertaking, but requires policy decision and intervention. As such, rules governing the IDN Variant gTLD strings are matters of policy oversight within the purview of the GNSO. In reviewing the policy recommendations on the subject, we find that the Outcomes Report of the GNSO Internationalized Domain Names Working Group, the IDN WG (<http://gns0.icann.org/en/drafts/idn-wg-fr-22mar07.htm>) which were adopted and incorporated into the GNSO Final Report on Introduction of New Generic Top-Level Domains (<http://gns0.icann.org/en/issues/new-gtlds/pdp-dec05-fr-part-08aug07.htm>) already include relevant policy recommendations for IDN Variant TLDs.

As such, we believe that implementation, consistent with existing policy recommendations, should proceed without further delay. Further, we observe that the IDN Variant TLD reports do not yet include review mechanisms. Considering ICANN’s commitment to accountability, openness and transparency of its policies and processes, we believe that such periodic reviews, together with participation from respective SOs, are important.

A more detailed response on the matters referred to above is attached to this letter as Annex 1. We trust that you will find this response constructive and helpful.

Of course, should you require further clarification or input, please revert to me in my capacity as Chair of the GNSO Council.

Yours sincerely,

Jonathan Robinson
Chair, ICANN GNSO Council

Annex 1: Discussions on the response to ICANN

The ICANN Board resolution of April 11, 2013

(<http://www.icann.org/en/groups/board/documents/resolutions-11apr13-en.htm#2.a>) requested that “ ... interested Supporting Organizations and Advisory Committees provide staff with any input and guidance they may have to be factored into implementation of the Recommendations”.

As a brief summary of the response:

- The IDN Variant TLD reports have made clear, and reaffirmed the community view, that IDN Variant TLD allocation and delegation is not a purely technical undertaking but requires policy decision and intervention. As such, rules regulating IDN Variant TLD strings, who such TLD strings can be allocated to and how they could be delegated are matters of policy oversight within the purview of the ccNSO and GNSO.
- The IDN Variant TLD reports have also made clear and reaffirmed the community view that IDN Variant and IDN Variant TLD requirements and experience from different IDN language communities differ, and that relevant expertise and knowledge from the local communities are important in the development of the overall policies at ICANN. As a result, ICANN should resist overreaching its scope beyond the technical coordination and administration of the root DNS, while facilitating appropriate implementation by local communities, especially to avoid delaying deploying some IDN Variant TLDs unnecessarily for some communities in waiting for others.
- While the IDN Variant TLD reports explain that homogeneity in the policy and implementation of IDN Variants by ICANN would be inept, the reports make it clear that programs akin to Universal Acceptance of IDN TLDs and broad-based outreach regarding the know-how and to-dos for IDN Variant TLDs must be prioritized by ICANN in order to make the implementation of IDN TLDs successful and relevant.

1. Policy and Governance

The “Examining the User Experience Implications of Active Variant TLDs” report specifically identified that “Conservativeness” is a matter of perspective:

“The definition and activation of variants are determined by linguistic and technical communities who may have differing perspectives. Linguistic communities are primarily concerned with end users, and consequently may advocate for a maximal variant label set to enable diverse linguistic expression and easier accessibility. The technical community, on the other hand, is primarily concerned with the security and stability of the Domain Name System (DNS), and therefore stipulates the minimal number of variant labels (if any) be added to the root zone.”

The balance between these two views of “conservativeness” is a policy decision; and one which the ICANN community must bear the responsibility of making. Rules and processes, including the Label-Generation-Rules as anticipated by the “Procedure to Develop and Maintain the Label Generation Rules for the Root Zone in Respect of IDNA Labels” report are in effect policies for the Root Zone of the DNS. These policies are shared between ccTLDs and gTLDs and as such, are within the purview of both the ccNSO and the GNSO as the respective policy development bodies.

More specifically:

1. The ccNSO and GNSO must be involved in the governance of the IDN Variant TLD rules, for example, they should be engaged in and participate in the periodic review of the processes to ensure their transparency, accountability and appropriateness.
2. The ccNSO and GNSO must respectively (separately) provide policy recommendations for the implementation of IDN Variant TLDs.
3. The ccNSO and GNSO policy recommendations should be implemented through the ICANN and IANA processes (including the allocation and delegation of IDN Variant TLDs and how this is reflected in the IANA database i.e. how the IANA WHOIS describes the delegation in relation to the Primary IDN TLD).

2. Local Community Experience and Knowledge

The “Examining the User Experience Implications of Active Variant TLDs” report examined various existing IDN Variant implementations across different IDN languages and scripts. A general conclusion can be drawn is that different IDN languages and scripts have different specifications based on their IDN Variant requirements, for example the use (or non-use) of “preferred variants” (in accordance with RFC3743).

Nevertheless, the report goes on to make a generally “uniform” recommendation (in Section 6.2) for the management of IDN Variants at the second-level agnostic of IDN language or script of the IDN. ICANN be cautious and recognize that the “recommendations” are considered “optional” by the authors of the report as explained by them in the ICANN Beijing meeting on the topic: <http://beijing46.icann.org/node/37191>

Furthermore, ICANN staff and board should continue to recognize the importance of engaging with and having direct participation from the relevant IDN communities in the development and implementation of policies affecting such communities. The experience, knowledge and expertise, linguistically, policy-wise, technically and operationally is invaluable and could be better leveraged by ICANN as it implements IDN Variant TLDs.

3. Policy Development & Implementation

As explained above, IDN Variant TLD work is a matter of ICANN policy and should require policy recommendations from the respective supporting organizations for implementation. In considering policies for IDN ccTLDs, we find that the IDN ccPDP final report: <http://ccnso.icann.org/workinggroups/idn-ccpdp-final-29mar13-en.pdf> included only a placeholder for IDN Variants (section J. Variants PLACEHOLDER). As such, we suggest that further work be considered to provide policy recommendations on the processing, allocation and delegation, of IDN Variant TLDs.

In considering policies for IDN gTLDs, we find that the Outcomes Report of the GNSO Internationalized Domain Names Working Group (IDN WG – <http://gns0.icann.org/en/drafts/idn-wg-fr-22mar07.htm>) which has been adopted and incorporated into the GNSO Final Report on Introduction of New Generic Top-Level Domains (<http://gns0.icann.org/en/issues/new-gtlds/pdp-dec05-fr-parta-08aug07.htm>) already included relevant policy recommendations for IDN Variant TLDs as follows:

4.1.3. Language Community Input for Evaluation of new IDN gTLD Strings:

Agreement that a suitable process for consultation, including with relevant language communities, is needed when considering new IDN gTLD strings.

4.1.4. One String per new IDN gTLD:

Agreement that the approach of the New gTLD PDP with one string for each new IDN gTLD application is relevant, except in the rare cases when there is a need to cover script-specific character variants of an IDN gTLD string.

4.1.5. Limit Variant Confusion and Collision:

Agreement that measures must be taken to limit confusion and collisions due to variants (i.e. substitutable characters/symbols within a script/language) while reviewing and awarding new IDN gTLDs.

4.1.6. Limit Confusingly Similar Strings:

Agreement that measures be taken to ensure that an IDN gTLD string with variants (see 4.1.4 and 4.1.5 above) be treated in analogy with current practice for IDN SLD labels, i.e. strings that only differ from an IDN gTLD string by variants (see above) are not available for registration by others.

IDN Variant TLD implementation for IDN gTLDs consistent with the above policy recommendations should not require further policy development processes.

More specifically, we reiterate the following key principles:

- **One Application:** IDN Variant TLDs should be considered as one single application together with its primary IDN TLD. This should be reflected in the application, the policies proposed by the application as well as the implementation by ICANN, e.g. agreement, fees, presentation in the IANA database, etc.
- **Limit Confusion:** measures must be taken to limit confusion and collisions due to IDN Variants while reviewing and awarding new IDN gTLDs.
- **Language Community Input:** a suitable process for consultation, including with relevant language communities, is needed when considering new IDN gTLD strings

4. Prioritization of Efforts on Internet Community Outreach

Consistent with the call for enhanced prioritization by ICANN on the outreach to the general Internet community for the Universal Acceptance of IDN TLDsⁱ and based on the different challenges identified in the “Examining the User Experience Implications of Active Variant TLDs” report, we recommend ICANN increase the priority for allocating efforts on outreach as it prioritizes its continued work to implement IDN Variant TLDs.

The importance of the promotion of awareness of IDN Variant TLDs is not dissimilar to that of promoting Universal Acceptance of IDN TLDs. They share a similar target audience and required technical and operational knowledge. Both issues are also related to consumer trust for the DNS, and relate to the ability of users to access and/or to utilize a domain.

ⁱ See also the Draft Final Report on the subject posted here:

<http://www.icann.org/en/news/announcements/announcement-2-25jun13-en.htm>