ICANN Transcription
IDNs EPDP
Thursday, 02 December 2021 at 13:30 UTC

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JULIE BISLAND: Good morning, good afternoon, and good evening, everyone. Welcome to the IDNs EPDP Call taking place on Thursday the 2nd of December 2021 at 13:30 UTC.

In the interest of time, there will be no roll call. Attendance will be taken by the Zoom room. We have apologies from Jennifer Chung today.

All members and participants will be promoted to panelists for today's call. Members and participants, when using chat please select Everyone in order for everyone to see your chat. Observers will remain as an attendee and will have view only chat access.

Statements of Interest must be kept up to date. If anyone has any updates to share, please raise your hand or speak up now. Okay, seeing no hands. If you need assistance updating your Statements of Interest, please e-mail the GNSO secretariat.

All documentation and information can be found on the IDNs EPDP Wiki space. Recordings will be posted on the public Wiki space shortly after the end of the call.

Please remember to state your name before speaking for the transcript. And as a reminder, those who take part in the ICANN multistakeholder process are to comply with the Expected Standards of Behavior.

Thank you, and over to our chair, Donna Austin. Please begin.

DONNA AUSTIN: Thanks very much, Julie. And welcome, everybody, to today's call. We've made some good progress on our first three questions. So hopefully we can make some progress today on A4 and perhaps A5.

So I just wanted to welcome the call … We have been appointed two Board liaisons, Akinori and Edmon. So Edmon's rejoining us now as a Board liaison. So I just wanted to welcome Akinori and Edmon and make folks know that they are officially the Board liaisons to this working group. So we're well served to have both of them available for the call. So thanks for joining.

I also note that Herb Waye as joined the call as well, and he's lurking. I'm not expecting any fireworks, but just a reminder to let's all be civil to one another. And that's been the case to date, so I don't see why anything's going to change today.

So just a reminder that Ariel sent to the list draft language in response to the first three questions that we've been through with the intent that you will have two weeks to consider that. If there are substantive comments on the draft, then we will take time during a call to review those and see if we can iron out any problems or concerns. If there aren't substantive comments, if it's

just terminology—or maybe "terminology" is the wrong word. But if it's just typos or minor edits, then I think we can do that off list and we'll resend the document with any changes .

So I just want to stop there and see if everybody is okay with that approach and to see if there are any questions or anything people would like to clarify in that regard. Okay, I don't see any hands so I will assume that, for the time being, everyone's fine. And if there are any … Obviously, we can iron out any questions on the list as well in the absence of being able to do it on a call. But the intent is that we would like feedback by—I don't know the date, but two weeks from Monday when it was sent.

And even if it's that the draft language is acceptable, that will be helpful. So I don't want to assume just because we haven't heard from you that you're fine with the language. I would rather that you confirm that the language as we proposed is acceptable to your group. So Monday the 13th of December is the date that we hope to get your feedback on the draft that was sent out on Monday. Okay, so I don't think we have any questions on that.

So as you know, with most PDPs the working group will seek written early input, and we've only received input from three groups. And I'm going to ask Emily to walk us through that. So Emily, I'll hand it over to you.

EMILY BARABAS: Thanks, Donna. And hi, everyone. This Emily Barabas from staff. Oh, and thanks, Ariel, for bringing that up,

So what you see on the screen here is hopefully familiar. It's the Wiki page that is devoted to early input received from different community groups. And you can also browse over to their [inaudible] was put it in the chat.

There were three comments received from the Registries Stakeholder Group, the SSAC, and from the ccNSO. And the ccNSO's response was specifically drafted by the ccPDP4 Variant Management SubGroup. So we're not going to spend a lot of time going through the details of every comment, but I did want to hit at a high level what we have here and give folks an opportunity if they have any questions or comments that are relevant to the topics we're currently discussing.

So the first comment is from the Registries Stakeholder Group, and this a fairly general comment that is applicable to the entire PDP, although some of it is specifically targeting some charter topics that we won't be addressing until later. Charter Topics D and G. So I don't know if it's … I'm not actually going to bring it up. I'm just going to kind of touch on some of the high-level themes and then give any Registries Stakeholder Group representatives who want an opportunity to elaborate if they think it's necessary.

So the focus of the Registries Stakeholder Group comment is first to note that there are some potential dependencies and intersections between the work of this EPDP and other community efforts such as RPMs group, Transfer Policy, the Temp Spec IRT; and that the PDP should ensure that it's coordinating appropriately on those efforts.

And then the second part of it, as I mentioned, focuses on Sections D and G of the charter and focuses on the input that "implementation of outputs should adhere to established contractual and procedural mechanisms" and that "suggesting specific language or contractual processes for registry agreements" is inappropriate for this work and out of scope for the EPDP.

So I don't know … I'm not going to, as I said, go into a great deal of detail. But I don't know if anyone from the Registries Stakeholder Group feels that there's anything that they need to elaborate on at this stage.

Dennis, thank you. Please.

DENNIS TAN: Thank you, Emily. Hello, everyone. I think your description of the Registries Stakeholder Group is accurate, and I just wanted to offer maybe a little bit of context.

On the first point about the different potential dependencies, that's something that it was highlighted and actually asked in our charter. So if anything, the Registries Stakeholder Group just wants to express the importance of that interdependency that might affect, especially regarding the same entity. How do we implement the same entity across the different procedures as far as RPM implementation Transfer Policy when you are going to transfer a set of variant labels? I mean, how is that going to work. Right?

If anything, again, is to highlight the importance of those questions that are asked in the charter about the cross dependencies across the different community efforts.

And on the other aspect about contract changes, again, it's a general statement. Right? We ask contracted parties. We like consistency and predictability as far as how our contracts are amended, changed, or updated. And that's [maybe] the spirit of those remarks. Thank you.

EMILY BARABAS: Thanks, Dennis. And I think there will probably be an opportunity as well to revisit some of the specifics of that comment when we get down Topic D as well.

So I'm going to very briefly talk about the comments from the SSAC and ccNSO that specifically relate to the charter questions we've already covered just to make sure that there's nothing that needs to be taken into consideration that has not already been discussed.

Ariel, I don't know if it's possible to bring up the working document. Thanks.

As we've previously mentioned, those comments that are [inaudible] specific charter questions are in the working document itself. You're welcome to reference those there. Very briefly on charter question A1, the SSAC references SAC060, specifically that the root zone must use the one and only—I'm sorry—must use one and only one set of rules for the RZ-LGR Procedure.

The ccPDP4 Variant Management SubGroup references its recommendation on the definition of variants and notes "compliance with RZ-LGR rules must be required for the generation of IDN ccTLDs and variant labels."

So I don't know if there's anything that folks want to elaborate on. I think that all of that has been taken into account already in the response to the charter question and is fairly clear. I'll note that Dennis has another comment on the SSAC response regarding charter question A4 that links to this response regarding A1. But Dennis, if you don't mind, maybe we'll hold that until we've done the intro to charter question A4 so that folks have a baseline before we dive into that. Is that okay? I don't hear objections.

DENNIS TAN: Thank you, Emily.

EMILY BARABAS: Go ahead.

DENNIS TAN: I just want to know one thing because I was going over an over these two potentially in conflict, I guess, observations from SSAC. It's this qualifier that they're using on the first comment. "Root LGT Procedure. And maybe that qualifier procedure means something different. Right? And I want to leave it there. As you said, let's go back to a4 whenever we get to it and see whether there is a potential conflict [inaudible] just misreading, misrepresenting what they're saying here. Thank you.

EMILY BARABAS: Thanks, Dennis. We can definitely do that. Thanks for putting a marker down. And also noting that, of course, the SSAC has provided feedback that they're willing to also potentially discuss in person if there are questions or clarifications needed. So there's an opportunity, if there are outstanding questions, to present those.

Let's go down to A2, please. There was just a response from SSAC. As you'll recall from our response to the charter question that's been drafted, for this charter question the EPDP had agreed that no recommendations or Implementation Guidance will be needed for self-identified variants gTLD labels for the 2012 program because they don't have legal standing and are for information purposes only.

And what the SSAC had provided here was some guidance on how the working group might be able to think about this data collection, and then looking at some of the interests and consideration. So I don't think there's anything contrary in that to what the group has presented.

I noticed that they mention doing research about delegated variant labels in ccTLDs, and I think that may have been a cut and paste error and they may have actually meant to speak to self-identified variant TLD labels by those former applicants from the 2012 round. So I think that may just be a typo.

Is there anything else that folks want to speak to here? Okay, going on to a3. I believe there wasn't actually anything in response to a3, but let's just double-check. Yep, so that's it.

And I'll note that there are only three comments in this early input round. And just wanted to say that, as a sanity check, this is not a red flag that the community is not sufficiently involved or something like that if folks are concerned. We've largely found in working groups, especially, where there's a representative model that there's already quite a lot of input coming in from the various community groups and that, to some extent, this a duplicative step, in a way, in the process to also have written input. So it's certainly welcome, but there's plenty of other opportunities. So we've noticed on a lot of PDPs that, this particular step, the input has been a little bit thin across the community. But maybe Donna can comment further on that as well. So I'll pass it back to her. Thanks.

DONNA AUSTIN: Thanks, Emily. And I think that's just a good reminder that … I think the requested input is in the operating procedures but wasn't updated when the representative model or PDP 3.0 was developed. So as Emily said, this isn't a red flag at all.

I will mention, though, on the SSAC input that the input is from members of SSAC but is not formally SSAC input. If folks understand the distinction there. So the input itself wasn't signed off on by all of a SSAC in a normal process that they would go through. It's just representative of SSAC members. And I don't

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know that there's anything that's inconsistent with previous SSAC work on IDNs, so I don't think that's problematic.

But I would remind folks that there is an opportunity to have a conversation with SSAC, and that invitation is open to us from Rod Rasmussen. And I would also note that we actually don't have any representation from a SSAC on this group. It was requested. In fact, I think I went back and just checked with Rod that they weren't going to provide a representative to this group. So that SSAC in put that we have received is important in that regard because we don't have anyone from SSAC on this group.

So as Emily has done here in placing the SSAC comments into the working document, that will be all the way through and it will be important for us in that regard because there isn't a member from the SSAC on this group.

Edmon, I see your hand is up. Go ahead.

EDMON CHUNG: Thank you, Donna. Well, I guess I'll be speaking in and out in this meeting. So if I don't remember to say that I'm speaking in my personal capacity, treat it as my personal capacity because if I am speaking as a Board liaison, I would definitely specifically note that.

So in any case, one question about the SSAC early response on A2. I remember from previous discussion with staff team, the current delegated labels for ccTLDs, none of them are considered variants. But in the A2 response from SSAC it says that analysis of the delegated variant labels in ccTLDs might be useful.

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I understand what it means, but ICANN has in the past maintained that no variant labels have been delegated for any TLD, including ccTLDs. Those are all considered separate at this particular point until we have an actual policy for it. So I want to get a sense of if …

Sarmad, has that position been changed? And is this the right way to think about it from what SSAC says? Or we should go back to maintaining that there are no variant labels actually delegated until the policy is in place?

SARMAD HUSSAIN: Thank you. So we have not changed the position, I guess, if the variants which were delegated were delegated as synchronized TLDs. And it's the same position. However, please do note that based on the Root Zone LGR published for the Chinese, those strings are actually considered variants. And that's something which is being discussed by the IDN ccPDP by the ccNSO. Thank you.

EDMON CHUNG: Okay. Thank you for that clarification. That's useful.

DONNA AUSTIN: Thanks, Edmon and Sarmad. Emily.

EMILY BARABAS: Thanks, Donna. I also just wanted to note that it's possible that this may have just actually been a typo as well. I think that maybe

some very similar feedback was provided to the ccPDP previously through a public comment period. And it may have just been that they brought a variation of that forward and there was a cut and paste error. So that's also a possibility as well. Thanks.

DONNA AUSTIN: Thanks, Emily. So Edmon, I just want to close this out. Is this something you want us to go back to a SSAC and confirm the intent? Or are you comfortable with Sarmad's reply?

EDMON CHUNG: I'm comfortable with Sarmad's reply if, at a later point, we seek … Let's say we have an initial report and we seek SSAC's further input and there is a discrepancy to that understanding. Then we can ask for clarification. At this point, I think that's clear enough.

DONNA AUSTIN: Okay. Thanks, Edmon. Dennis, did you have anything to add, given—I think—you're a liaison to the ccPDP?

DENNIS TAN: No. I just maybe to observe that on the ccTLD area, there is no [inaudible] declaring the variant string here, self-identified—that topic. There is no such terminology in the ccNSO, but [desire] TLD variants. And we are dealing with that aspect as well. So I think this working group on the ccPDP4 understands the issue and we're dealing with that.

DONNA AUSTIN:	Okay. Thanks, Dennis. Alrighty. So I think we're done on early input. We can move on. Okay So Ariel, I'm going to hand it over to you for our next topic which we start with A4.
ARIEL LIANG:	Yes. Thank you very much, Donna. So for this topic, we're going to present an initial analysis among leadership team and staff with regard to A4. The purpose of this analysis is to understand whether we truly have a problem to solve. If so, then what is the problem to solve? So we'll start with this initial analysis here.

First, let's just refresh our memory of what A4 is asking. And that's the exact wording of the charter question on the screen here, the first part. I will read it quickly. But that's a context. The actual question is in the blue box.

"For future gTLD applications, the SubPro PDP proposes an Implementation Guidance that if a script is not yet integrated into the RZ-LGR, applicants should be able to apply for a string in that script, and it should be processed up to but not including contracting. Applicants under such circumstances should be warned of the possibility that the applied-for string may never be delegated and they will be responsible for any additional evaluation costs. The burden in this case is on the applicant, who may have to wait for an indeterminate amount of time but is not aware of any other serious concerns. The SubPro PDP developed this Implementation Guidance by taking into consideration the TSG recommendation that the application should remain on-hold (or other appropriate status) until the relevant script is integrated into the RZ-LGR."

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So that's the context or origin of the question, and the question itself is, "The working group and the SubPro IRT to coordinate and consider the following questions in order to develop a consistent solution: should the SubPro recommendation be extended to existing TLDs that apply for a variant TLD label whose script is not yet supported by the applicable version of the RZ-LGR? Also, consider this question in tandem with B4 and by taking into account the data to be collected in the Data and Metric Requirements section of this charter. If not, what should be the process for an existing TLD registry who wishes to apply for a variant TLD label whose script is not yet supported by the applicable version of the RZ-LGR."

The reason why we're asking for coordination hear in this charter question is because SubPros' Implementation Guidance have implication to future gTLD applications. And then this group is supposed to discuss the implication to existing gTLD applications,

I see Jeff's hand up. But, sorry.

DONNA AUSTIN: Yeah, Ariel. And then just before we move on, one of the challenges for us or potential … It may become an issue. It may not become an issue. But this charter was developed on the assumption that the SubPro PDP would have been approved by the Board and the SubPro IRT would be up and running. And we all know that that's not the case.

So I think in updating the Council, I am going to call out that we recognize that that assumption when the charter was developed

didn't hold. But we are making assumptions along the way that the SubPro recommendations will be implemented, and we're moving forward in that regard. And we're hoping that things don't become unraveled if the Board doesn't ultimately approve the SubPro recommendations.

So I just wanted to call that out. I meant to call it out earlier so that people don't get too hung up on that. We're just moving forward with … It's unfortunate that we don't have an IRT to coordinate with, but that's just a reality. So I guess we're the front runners here and we can decide which way to go on this.

So Jeff and then Michael.

JEFF NEUMAN: Thanks, Donna. And it's a good point. We never anticipated that, SubPro, that there would be this long gap. But on this one, I think this question may be easier than we might think in the sense that, at this point in time, we have never said that an existing TLD that applies for a variant is anything but a new gTLD application. Right? It's not like this group has come out with a pronouncement yet and we should discuss that because that's really the root question you've got to answer first.

Is an existing TLD application for a variant TLD label considered a new gTLD application? And if the answer is yes, then this charter question just becomes moot in a sense because an existing TLD that applies for variant is just a new gTLD application, no different than all the others that SubPro has made recommendations on.

If this group, however, decides that it is different, that's when we need to answer this question.

DONNA AUSTIN: Yeah. So Jeff, there's another take on this which Ariel will come to which might end up, depending on how the group responds, that this question may be moot for other reasons. So we can just let Ariel run through the rest of her deck here. I think we may end up at the same conclusion, but perhaps for a different reason.

Michael.

MICHAEL BAULAND: Maybe you're referring to what I was just going to say. I think that all existing gTLDs are using a script which is already in the Root Zone LGR or are currently in the process of being integrated to the Root Zone LGR. So for that reason, the question would be moot if there is no existing TLD with a different script because then there's no variant in a different script either. Thank you.

DONNA AUSTIN: Thanks, Michael. You've just stolen Ariel's thunder. But Ariel, if you can continue through so folks can understand the analysis that's been done. Ariel, I'll hand it back to you.

ARIEL LIANG: Thanks, Donna. Thanks, everyone. I think great minds think alike. That's why we highlighted these phrases here—"… existing TLDs … whose script is not yet supported by applicable version of RZ-

LGR"—in order to understand whether there's truly a problem to solve. So [we'll] present our finding here.

So first, let's just see what are the existing gTLD scripts. So a based on the data that Pitinan and Sarmad's team collected, Arabic, Chinese, Cyrillic, Devanagari, Hebrew, Japanese, Korean, Latin, and Thai are the scripts of the existing gTLDs. And then let's just see, are they all supported by the latest RZ-LGR? And our finding is that the latest version RZ-LGR version 4 has already integrated Arabic, Chinese, Devanagari, Hebrew, and Thai. But there are several scripts that are not yet supported by the current version of RZ-LGR. And these are Cyrillic, Korean, Japanese, and Latin.

So for Cyrillic and Korean, these script proposals have already been completed and they have already gone through the public comment process and finalized. And they're currently waiting for integration into RZ-LGR version 5.

And then for the Japanese and Latin, their public comment periods only recently completed for the script proposals, and community feedback has been received. So staff actually did a little bit of digging and checked the community feedback. For Japanese proposal, it has received a few community feedback. But they're all positive so we don't foresee that there will be dramatic changes to the proposal based on that impression.

But for the Latin proposal, it did receive a bit more community feedback and there's some divergence for the Latin proposal. So for the next steps is for their respective Generation Panel take into account the community feedback and finalize the script proposal;

and then for the Integration Panel to consider integration into the future are RZ-LGR version 5.

So the following question is, what would be the estimated timeline to launch the version 5 for RZ-LGR? So based on our discussion with Sarmad's team, the hope is to launch that in mid-2022. So very in the near future. And that version 5 will cover all of the scripts of existing gTLDs.

So based on that finding, we also did a little bit further digging about the Latin script situation because we did see that there are some divergence of opinion in the community feedback and we're wondering whether there could be a potential issue in terms of delaying the launch of RZ-LGR-5 because of Latin script.

So the further digging, we fine the following. Among the existing gTLDs in Latin scripts, there are 1,170 existing gTLDs in that script. And that includes .web and .webs in pipeline. And that's based on what Sarmad's team presented in terms of the data collection finding. And all of the Latin script gTLDs except for the two—I'm sorry, I can't pronounce them. These are German, I think. All of them are ASCII labels.

And then there is a fundamental point or principle in terms of what can be delegated for ASCII gTLDs is that the ones for delegation, they do not have any allocatable variants, only blocked ones. And that's a principal point that we haven't seen challenges from the community in terms of public common feedback. So basically, this is something that is a key point and we hope the members in this team can remember.

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The only allocatable variants within the Latin scripts … There are only two. One is the sharp S (ß) in German, and the other is the dotless i (ı) in Turkish. However, none of the existing gTLDs contain these two letters. So basically we're only dealing with ASCII gTLDs in Latin script and then plus the two German ones that have the dotted O (ö). But these are not allocatable variants.

So based on this further analysis, our conclusion is that even if the RZ-LGR version 5 launch is delayed, it is extremely unlikely that the existing Latin script gTLD operators could apply for allocatable variants because they do not exist. So that's our finding.

And I see Jeff has his hand up, and I will stop here.

JEFF NEUMAN: Thanks, Ariel. And I think we're getting too much into the weeds before answering the fundamental question. So this good stuff. Right? But I do think we need to first answer the question that I put in the chat, which is, is an application by an existing gTLD for a variant label the same thing or should it be treated the same as an application for new gTLD in the next rounds?

And the reason that's important to answer is not just because of this one question which I understand we can declare this one question moot. But this question is going to come up over and over again with respect to contracts and fees and evaluations and timing. All of that stuff is going to be related to the big, big overarching question.

So Donna, I hope that answers your question. We should decide the fundamental question first because that could either eliminate

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a lot of future consideration of some questions or it could make answering those questions that we have more important. Does that make sense?

DONNA AUSTIN: Thanks, Jeff. I'm going to let Edmon go, and then we'll … I'm interested to hear from others on this point as well. Edmon.

EDMON CHUNG: Yeah. And, again, speaking on a personal capacity and contributing to this group. I think it is a legitimate question, but I think we also need to look at the history of what we call IDN variants and the Label Generation Rulesets and the entire mechanism to put this concept together. And that is the assumption that this is the same TLD. It just so happens that because of the IDN technical implementation, we are unable to map the two TLDs together. But nevertheless, the whole concept of IDN variants is that they are linguistically supposed to be considered the same, and therefore in terms of applications, in some sense it should be one in the same.

Again, I go to the worst way to describe the concept, but it is the best I can come up with. Which is that in an ASCII TLD, you wouldn't consider a capital letter and a small letter domain application to be separate because they were conveniently, technically mapped together. But in the case of IDNs with the different languages, the fundamental reason for why there is IDN variance is because they are supposed to be mapped together but

technically it was difficult. And therefore, policy needs to be put together on this.

And we can trace this back to the very original IAB statement on the issue and subsequent statements through the IETF and, in fact, I think SSAC statements on the same.

So I think this is something that we need to bear in mind as we consider the issue because otherwise, then we're just talking about look-alike strings or confusingly similar strings which is dealt with in other policies in the gTLD process.

DONNA AUSTIN: Thanks, Edmon. Jeff is that a new hand?

JEFF NEUMAN: Yep. That's new.

DONNA AUSTIN: Okay, go ahead.

JEFF NEUMAN: So yeah, Edmon … And I'm not saying you're … I'm not agreeing or disagreeing. I think what you're saying makes sense, but you're answering the question before we even ask it. Right? You're giving me your answer to whether an application for a variant from an existing TLD should be treated differently than an application for a wholly new, separate gTLD. And I accept that.

But this group needs to discuss that and research it. And if we all come to the same conclusion, great. But then we've now answered a question. But until we do that—ask the question, do the research, as I think Maxim was saying in the chat—until we do that, then we're all coming at this from different viewpoints. Thanks.

DONNA AUSTIN: Dennis.

DENNIS TAN: Thank you, Donna. If I may. Jeff, I just want to understand. Let me paraphrase what I think I understood from you. There is a question whether [inaudible] an applicant comes forward with a script that is not yet supported to apply for. Should the application move forward or not?

I think there are a couple of items there, or dimensions. One is the existing gTLDs. Right? And they're not applying for a nominal or original label, but a variant of it. And then the other one is what SubPro is going to be dealing with, which is new original labels. And I'm just picking this term "original" as in the first label and potentially variants.

And it seems that SubPro dealt with how they would like to or how they envision a process to deal with that situation when the script is not supported. So I think I understood from you that whenever those new gTLDs want to apply, I mean not in the same round but in the future when they become existing gTLDs in the future, how they apply for those variant labels. Is that how …

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I think that's what I understood, but I'm not sure that's the right takeaway.

JEFF NEUMAN: Sorry, Donna. Can I respond?

DONNA AUSTIN: Yeah, okay. Go, Jeff.

JEFF NEUMAN: No. I'm saying even for existing TLDs today … So let's say I don't know if [shavaka], for example … I don't know if there are variants of that one. I'm just picking one off the top of my head. Right? Or even any … Let's say Chinese IDN top-level domain. If they say, "You know what? We want this variant delegated because we want to use it," the fundamental question we need to answer is, is that considered a new gTLD application or not?

And if it's a new gTLD application, then as Maxim puts it, I think, are we saying that we can delegate these without going through rounds or outside that round process? Maybe the answer is yes. I don't know. Right? We need to discuss that issue because it sounds like some people in this group are assuming that an existing gTLD that wants a variant label can go through a process other than through the new gTLD rounds. And that might be the answer. Right? I don't know. But we haven't discussed it.

DONNA AUSTIN:	Yeah. Thanks, Jeff and Edmon and Dennis and others for the discussion. I could be wrong, but I think the intent of this question is to deal with applications from 2012 and identify whether …
	And Jeff, I take your point about it could a … It would be potentially in the new gTLD process, but I think what Dennis has said, I think that is further down the charter that we would address that question. I think what we're trying to do here and why Ariel has done the analysis is to see whether we actually have a situation now from 2012 that there are variant labels that applicants had identified, but the script wasn't supported by the applicable version of the Root Zone LGR.
	To me it seems to be that the important part of these questions about who's script isn't yet supported by the Root Zone LGR and if we found that there actually were variants whose script wasn't yet supported by the Root Zone LGR or won't be through version 5, then we'd have that question of whether it would follow the SubPro recommendation that it wouldn't go through to contracting. That it would go as far as contracting, but then wouldn't be delegated until such time as the script was known.
	So maybe it's a little bit of clunkiness in the question, but I think what we're trying to establish here is, with the existing TLDs that applied in 2012 and whether the scripts aren't yet supported by the applicable version.
	But Jeff, I take your point about whether that extends, whether they become new applicants or not. But I think, as Dennis said, that's in a different section of the charter.

JEFF NEUMAN:	But the root of the question … Sorry, Donna. The root of the question is … I know it was underlined here, but before you get to the underlined part, "should SubPro recommendation be extended to existing TLDs"—and then the next two words—"that apply for a variant TLD label."
	Well, at this point there is no process to accept the applications for variant TLD labels, and therefore we need to decide whether an application process for existing TLDs or whether there should be an application process for existing TLDs to apply for variant TLD labels outside of the rounds. Right?
	That's the root of the question because if you don't get there, then the second part—"whose script is not yet supported by applicable version of the Root Zone LGR"—it's immaterial because then if we decide, for example, that it's considered a new gTLD application, then the SubPro recommendation applies no matter what because we're considering it a new application in a new gTLD round.
	If we answer it the other way, though, then and only then does it become important.
DONNA AUSTIN:	Okay. So I've got a queue. So Ariel and then Dennis.
ARIEL LIANG:	Thanks, Donna. And thanks, Jeff. So staff is just wondering whether it will be actually more efficient to conclude this portion

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first before we dive into the fundamental question that you posted because this question is asking for script that's not yet supported by an applicable version of RZ-LGR. It's not asking what would happen if existing gTLDs apply for a variant TLD whose script is supported by an applicable version of RZ-LGR. That's a different question.

So would that be more efficient if we conclude this one first because based on the findings here, the existing gTLD scripts are either already supported by RZ-LGR-4 or will be supported by RZ-LGR-5 that will be launched in mid-2022, as hoped.

So now we can go to that fundamental question and, in fact, the reason when we drafted this question and also mentioned B4 is that B4 may be the place to discuss the fundamental question that Jeff mentioned. So if appropriate, staff can also put the wording there and see whether that's truly appropriate to discuss that one.

DONNA AUSTIN: Dennis, go ahead.

DENNIS TAN: Thank you, Donna. So I think what I'm hearing from Jeff is that it's a sequencing problem/issue. I wouldn't mind—I'm speaking for myself here—I wouldn't mind, since it looks like this particular A4 question is a kind of no-brainer—[moot questions, too]—not bringing or making any conclusion just yet. But whenever we reach out to the fundamental question as far as how do you treat a new application of a variant TLD, or a [inaudible] TLD? How do you treat that in terms of framework and processing, what have

you? Then come back and close A4. I mean, just an idea to think of. Again, because A4 seems to be a moot question based on the data discovery that staff has made. Very useful, by the way. And, you now, let's answer the fundamental question whenever we reach that point and we'll come back and close A4.

DONNA AUSTIN: Right.

DENNIS TAN: Thank you.

DONNA AUSTIN: So Dennis, I think that makes sense to me. Jeff.

JEFF NEUMAN: Yeah, I mean … Exactly. We can't answer this question until we answer the question I brought up because it wouldn't matter whether the question said, "Should it be extended to existing gTLDs that apply for a variant TLD label whose script is supported by the applicable version of the Root Zone LGR?" Right? I understand this part. I understand this part is moot. But again, we can either throw out the question or park the question, but we can't answer it.

DONNA AUSTIN: So Jeff, I think we need to accept that there are different interpretations to this question. And I think, based on what had

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been assumed that the question was, then the analysis that Ariel has showed us indicates at this point is moot. But we can have just a placeholder that says, "Based on the analysis, this question is moot because there is no gTLD applicant from 2012 whose script is not yet supported by the root zone LGR" with a qualifier in there that this is something we need to come back to because of the question of what to do with a new application.

And that will be considered. That's a question that is later in the charter. So I don't think we throw out the question. It was obviously there for an important reason, and staff have done the analysis. So I think we can … If folks agree, and I think Michael is on board that the … The question is moot, but it's not a case to throw out the question.

So Jeff, can you accept that we actually will get to that question later on in the charter?

JEFF NEUMAN: Yes, but it's just a heads up that there are other questions before this in the charter that may be in the same position. And so we should push those. We might want to move that overarching question up. That's all, yeah.

DONNA AUSTIN: Okay, all right. Emily, we captured all that to your satisfaction? Okay, great. Thanks, Emily. So where are we? Ariel, can we move to …

ARIEL LIANG: Yes. Although there was another plan to talk about the open item about A3 which is related to A4, I don't know whether, Donna, you'd like to speak on that point yet or we should just skip it for now.

DONNA AUSTIN: I think we'll just skip for now. We'll move to A5. Thanks, Ariel.

ARIEL LIANG: Okay. So A5 is basically a staff introduction of this question, and we hope we can provide some necessary background for the team to digest before we go into the detail of this question. So I will just start with presenting this background in context. And also, Sarmad is going to take over for the other part of this presentation. So we will tag team on that, and hopefully the information presented will be helpful for the deliberation. So first, I will just read the charter question itself.

"SAC060 notes that variant code points in LGR may introduce a 'permutation issue', possibly creating a large number of variant domain names, which 'presents challenges for the management of variant domains at the registry, the registrar, and registrant levels.' SAC060 advises that 'ICANN should ensure that the number of strings that are activated is as small as possible.' The TSG agreed with this SSAC advice. Appendix C of the Staff Paper reviewed the factors causing numerous variant labels and suggested measures to address this issue."

So this is A5. So the question is, "Should there be a ceiling value or other mechanism to ensure that the number of delegated top-level variant labels remains small, understanding that variant labels in the second-level may compound the situation? Should additional security and stability guidelines be developed to make variant domains manageable at the registry, registrar, and registrant levels?"

So that's the question for A5 about ceiling value or a mechanism to minimize the number of TLD labels that can be delegated. So let's just dive into the actual context of this charter question.

And if you recall, there were three documents mentioned. So one is to SAC060 recommendation. And one is the TSG recommendation. And then there's the Appendix C Staff Paper. So let's just see what we're looking at from the SAC060 recommendation, what they recommend. So the recommendation is—

DONNA AUSTIN: Ariel, can you just hang on a sec? Sorry.

ARIEL LIANG: Okay.

DONNA AUSTIN: Jeff, did you have a question or can we let Ariel finish this part and then come back?

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JEFF NEUMAN: No, let Ariel finish. Sorry.

DONNA AUSTIN: Okay.

ARIEL LIANG: Okay, thank you. So the recommendation from SSAC is, "ICANN should ensure that the number of strings that are activated is conservative."

So these are some main bullet points I listed here from that recommendation rationale. So basically what they're saying is that variants could introduce a permutation issue, both at the top-level and with a combination of top-level and second-level. They actually provided an example. So for example, if a top-level label has four letters and each of them has three variants, then the total number of variant top-level label could be three multiply by three multiply by three multiply by three. So that's 81 labels that are a possibility.

And then if you compound that with the second-level and if the second-level labels, each letter has a variant as well, then that will be a really big, astronomical number. So as a consequence, a large number of variant strings presents challenges for management of variant domains at the registry, the registrar, and registrant levels. And that's pretty intuitive that if you're trying to manage thousands of domains or tens of thousands, then it becomes a problem.

So some registries already have imposed additional rules for variants. There's one example called "no mixing." And I think that's something Edmon mentioned before. So for some Chinese domains … So Chinese has simplified Chinese and the traditional Chinese characters. And so for a domain label, all of them needs to be either all simplified or all traditional and there's no mixing. So there are some already existing rules implemented by registries to minimize the number of variant labels.

And also there's another point in SSAC. They mentioned that a variant TLD application must be accepted only if the TLD applicant clearly demonstrates the necessity for activating a string. And that's another key point. In fact, there's no current policy to clarify or dictate what strings can be delegated. So the fourth bullet point here is actually something this EPDP Team needs to consider and potentially develop recommendations for.

And then SSAC concluded that variants that are not necessary but are desired must not be allocated and activated. So this is kind of related to the previous charter question discussion about self-identified variants. So some of them are desired but they're not actually variants based on RZ-LGR calculation. And even if they are allocatable based on the calculation, do they truly need to be activated? That's something some policy needs to provide guidance on.

So as Emily mentioned earlier, the SSAC has provided early inputs to this charter question as well, and they reiterated their recommendation in SAC060 that I just presented here.

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Then the following document that was also mentioned in the context of A5 is the TSG Recommendation 14. So basically the TSG also agrees with what SSAC recommended that too many variant labels should not be delegated. And also, the TSG made it clear that the matter of limiting the number of allocatable variant labels should be a policy matter. And the TSG asked the reader to refer to Appendix C of the IDN Variant TLD Implementation Staff Paper for more suggested approaches.

And that segues to the third document that we are on the slide here, which is Appendix C of the Staff Paper with regard to "limiting the IDN variant domain names with the delegation of IDN Variant TLDs. So this paper reviewed many factors that caused the numerous variant labels and suggested measures to address this issue.

Just to emphasize that this is purely a staff analysis and suggestion from the Staff Paper. So that's for the consideration of this EPDP Team to see whether they are appropriate and whether any additional things need to be done.

So Jeff is Jeff's hand still up?

JEFF NEUMAN: Yeah.

ARIEL LIANG: Should I continue or do you have any immediate questions?

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JEFF NEUMAN: Yeah. I'd like to address this if I could because this is an area that is always … This question and this SSAC recommendation and the TSG and the Staff Paper have always bothered me for a long time. This is an example of overregulation. This is us trying to play big brother on registries. What you've already said is that registries have an incentive and they have, in the past, imposed their own additional rules to make them manageable. Right? So registries that have had this issue come up before them have recognized and have dealt with this issue. For us to prescribe how many variants are "necessary," which is impossible and is outside the scope of ICANN because ICANN doesn't regulate content. So how could ICANN decide what is "necessary" and what is "not necessary" or desired?

So all of this is just so overregulation beyond the scope of ICANN's mission. Sorry, I have very strong feelings on this one and we should not be … There's no way that we can, as a policy matter, decide the right number or even the factors because this is just beyond ICANN's scope. So thanks.

DONNA AUSTIN: Well, I think that's the question we have in front of us, Jeff. So we're going to have to have a discussion around it. Maxim.

MAXIM ALZOBA: I would like to underline that ICANN is about factual-based policymaking, and I would like to ask staff if there are any facts supporting those ideas in the paper so we could check it and apply if possible. If not, then most probably those items are not

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applicable to the process because when one committee says, "Oh, it's too much. We need to stop that" without, in effect, supporting it, it might be against the factual-based policy creation approach. Thanks.

DONNA AUSTIN: Thanks, Maxim. Michael. Did we lose Michael?

MICHAEL BAULAND: Oh, sorry. Sorry, I forgot to unmute.

DONNA AUSTIN: That's okay.

MICHAEL BAULAND: I just unmuted the phone. So this question is maybe also related to the previous one. Is a variant TLD normal gTLD application, and does it cost as much money as a stand-alone TLD application? Because then this may be resolved by the market, so to say, because no registry wants to pay millions of dollars for their 10 or 20 or 100 variants.

And apart from that, I'm basically with Jeff and Maxim that the Root Zone LGR is already designed such that variant generation is minimized, that most variant relations should be blocked and only in exceptional circumstances they should be allocatable. And I think that's the only restriction we should have—the one from the Root Zone LG—and no more restrictions should be imposed by us. Thanks.

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DONNA AUSTIN: Thanks, Michael. So some of your questions are related to questions later in the charter. Ariel does have more slides to go through on Appendix C for the Staff Paper which, perhaps Maxim to some extent might answer some of your questions.

And I think there is an element of security and stability that we have to bring into this as well. So let's keep that in the back of our minds as well. This is a policy discussion, so we're going to have to decide whether we agree to put the ceiling on these things or whether the market decides or whatever.

But I'd like Ariel and Sarmad to go through the rest of their presentation, and perhaps then we'll come back and have more substantive discussion on this. So you're good to go, Ariel.

ARIEL LIANG: Thanks, Donna. So the reason why we're doing this presentation is to provide necessary information and context for the charter question for your consideration. Certainly it's not to dictate where the direction should go, but these are some existing studies already being done. And [inaudible] it's our obligation to show you what has been done with where the information can be helpful.

But it's definitely up to the EPDP Team to decide on policy recommendations and answer fundamental questions. For example, should there be a limitation on variants that can be delegated? That's a fundamental question this group should answer. But we will give you the information that possibly can help you answer that.

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So just moving on to Appendix C. This paper analyzed some of the causes for the permutation issue with regard to allocatable variants TLDs. So there are some overproduction issues here. Although I'd like to caveat this by saying overproduction issue is not always the case because when the RZ-LGR is designed, it is already optimized on the script level.

So the Generation Panel already considered to limit the number of allocatable variant TLDs. And as you recall, their goal is to minimize allocatable variant TLDs but maximize the blocked ones. And that's already done at the script level for the RZ-LGR proposals.

However, as you know, many scripts are used across different languages. And I think some of you may know that for the Latin script, it actually has implications to 250 plus languages. And then for Chinese hand script, as you know, Chinese/Japanese/Korean all use it. So the proposal itself may be optimized on the script level, but it may not be optimized on the language level because different language communities use scripts in different ways and there may be some redundancy that could happen there. So that's why there is an overproduction issue for some cases.

So the Appendix C provide the analysis in terms of the cause. They include four causes. So the fundamental one is the difference in analyzing variant labels for RZ-LGR compared to their use by the end users in specific language communities. So that reiterates what I just mentioned there before. When the Generation Panel designs the RZ-LGT, they look at the wider use off the script across all languages and all communities using that script. But when a TLD applicant applies for a certain label, they

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only focus on the particular language when identifying that TLD label and it's variant label. So the scope may be narrower.

So because of this fundamental issue, there is basically a gap between what is appropriate in theory and what is appropriate in practice. And then that discrepancy could cause overproduction. So that's one of the fundamental causes.

And then the second cause is using the same script across different writing systems. So that's basically related to the point I mentioned earlier, too. So for example, hand script is used by both Chinese and Japanese language communities. And then for Chinese, some labels can be regarded as variants because traditional simplified version. But those are regarded as unique in Japanese.

So when the script proposal is designed, it's designed in the goal to be as comprehensive as possible and encompass all the language communities that use that script. So what variant label could be regarded as variant in Chinese may not be regarded as variant in Japanese. But then it's a redundancy issue that's caused there. So that's the second cause.

And the third cause is the usage conventions. So the RZ-LGR may allow some allocatable variant labels which are not well formed according to usage conventions. So that means it's basically, I guess, the grammar structure of the language, as some part of the label can only happen in the end of the word. But RZ-LGR may allow it to be in the middle of it, and that could cause the issue and make a label not well formed.

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And then the final cause is the meaningfulness of variant TLD labels. So some of the labels such as brands, geographic names, community names, country codes need to be meaningful and they need to use a specific label for that. And if you have a variant generated for it, it may lack the meaningfulness. So then it will cause overproduction.

So these are some of the causes the Staff Paper has the analyzed. And it also talked about the limitation of using the label disposition in RZ-LGR. As mentioned earlier, RZ-LGR tried to maximize the blocked labels for variants and minimize the allocatable ones. But as you know, RZ-LGR is a tool and it mechanically or algorithmically creates this set of valid and allocatable variants. But only a small subset of that should be delegated, and that's something …

A policy probably needs to come into a position to [help] figure out what's an appropriate process to evaluate what allocatable label that can actually be used for delegation.

So that's some of the conclusions, I think, from the Staff Paper Appendix C. And I will stop here and let us see. There are several hands up, so I will stop here for now.

DONNA AUSTIN: Thanks, Ariel. I'm just reading through the chat. So I see a couple of hands up, and I'm also mindful of time. So we've got about 14 minutes left, by my calculation. So the chat has been … There's a bit going on in the chat. I'd like to hear from other … Maybe if the ALAC Team has anything to say or members from our GAC

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colleagues. I'm interested to get thoughts from others here as well.

So Jeff, Michael, and then Maxim.

JEFF NEUMAN: Yeah, thanks. I learned early on that when you set policy, it needs to be based on actors acting rationally and I just don't see this as an issue. This is not something … We should not assume that registries are going to apply for so many labels that they don't realize they're not going to be able to handle them. It's an impossible decision for ICANN or any of us to make as to what is "necessary."

And therefore, the Root Zone LGR is already limited, as shown in this chart, as to what is allocatable. Anything else … In my view, there should never be a policy for us to artificially introduced a rule that would limit, in any way, the labels for delegation as long as they're allocated labels because there's no fair way or rational way that we can do it. Thanks.

DONNA AUSTIN: Thanks, Jeff. Michael.

MICHAEL BAULAND: I agree with Jeff here, and I've got a question regarding one or two slides before. There was something [inaudible] usage as a reason. One before. Even one before, I think. No, hmm.

Oh, yeah. Usage convention. What is exactly meant by this? Well-formed, I mean. If it's referring to a language, I don't think we should make any decisions here because TLDs may well be some artificial company name or whatever and it's not really referring to any convention. So I don't think there should be a restriction here. Thanks.

DONNA AUSTIN: Thanks, Michael. Maxim.

MAXIM ALZOBA: I think when we use considerations such as overproduction, etc., it should be measured. Something measured, not just we do as … Yeah, we do the smallest amount possible because the smallest amount is doing nothing. And effectively, it will prohibit the variants which I'm not sure are in the public interest. And also, I would like to know that situation in which [SSAC] or some technical boards decide which particular language is not worth deploying. It's going to cause huge scandal, and it's not in the public interest to have this. Thanks.

DONNA AUSTIN: Thanks, Maxim. So I think what I'm hearing and what I seem to be seeing in chat is that—Ariel, can we go back to the question, please—that despite the SSAC advice and the work done in the staff report, what I'm hearing is that there shouldn't be a ceiling value or other mechanism that constrains the number of variant labels that can be delegated at the top level. So that's what I'm

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hearing, and I'd be interested to hear from others that have a different view on this.

Dennis and then Edmon.

DENNIS TAN: Thank you, Donna. I don't necessarily have a different view from what others have said. I think I tend to agree with certain aspects or concepts here about registry … Assuming, you know … We're working in the context that registry operators are rational actors conducting business and so forth.

But my comment was on the direction in the spirit of keeping the discussion moving forward into a databased, decision-making process. I'm not entirely sure, but I think the Staff Paper goes into the details of, I'm not sure measuring but at least listing the potential issues of explosion of this permutation issue. And if we perhaps assign probability and consequences of each one of those, it might help us go through this decision-making process again. Looking at these issues and assigning certain probability and consequences of each of these items.

And maybe that will help because I see in certain cases, for example the well-form issues or labels not representing exactly brand name it. I think it would be [irrational] to think that the applicant would apply for those labels even though they are allocatable. Right? I mean, why would they apply for a label that is not meaningful for them even though it's allocatable?

So perhaps going into that direction, again assigning … Look at the issues that staff is proposing or has already investigated and

listed. But assigning a probability/consequence, and potentially we come up with some mitigation measures which is educational. Right? Which, education prior to any process and stating, "These labels do not behave the same unless you need to do something." Right.

I want to go back to Edmon's example about the "original"—I'm using my air quotes here—"original" variant. The uppercase, lowercase [inaudible]. Right? They don't behave like that. So, yeah, that's an idea. Thank you.

DONNA AUSTIN: Thanks, Dennis. So I think Ariel did mention that kind of compound effect can add up over time. Taking Jeff's point that registry operators are rational and they're not going to apply for something just for the heck of it. But with IDN labels, there could be a consequence that was unintended by the registry operators. So that's something else that we need to bring into the discussion.

Edmon and then Satish.

EDMON CHUNG: Yeah, just briefly. I don't disagree with the approach that is described here, earlier in many different speakers. And I want to say that I started off with that position as well, and then I have a "but."

But, as I put in the chat, I would suggest that if this group is open to it, to invite especially the Integration Panel group to present their case because this "ask" really, from what I understand,

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originated from there. There is a concern from the technical team at the Integration Panel for the Root Zone LGR, especially with what is called the Conservativism Principle. And they would feel more comfortable if there is a ceiling for, let's say, four or five to start with.

And then as ICANN—not the gTLDs, but ICANN, the root level—can manage it, that can potentially be expanded and the ceiling lifted. That would give them … I'm really not giving this the best way to describe it because I personally, as many I've spoken, agree that this kind of ceiling does not make the best sense in the long run.

But I have to say that I've been convinced by the IP that this might be a useful thing for a particular period of time. So I would suggest that we ask them to brief us on it and see what their views are and why they are looking to the policy side to set an actually arbitrary limit, and what is good for ICANN and the root zone. So I think that's something that I put out to the group.

DONNA AUSTIN: Thanks, Edmon. It's a good suggestion. We can take that on board and give it some thought.

I've got Satish. Go ahead.

SATISH BABU: Thanks. So on the whole, we would support a more conservative approach where we are data driven in this [formulation] of the policy. So I would support Dennis's proposal to learn more about

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the implications and the probabilities of this [inaudible] explosion, or whatever you call it, on the stability. So we are concerned about that.

We would also support phase by phase opening it up, initially starting in a very conservative manner. But if everything works fine, we can consider opening it up further. But data driven, I think, is very key. Thank you.

DONNA AUSTIN: Thanks, Satish. So we're two minutes out. So Jeff, if you can be quick. And then we've got Ariel, and then we'll have to wrap this up. Thanks.

JEFF NEUMAN: I agree that we should be data driven, but data driven on the problem as well as on the solution. So the SSAC and/or TSG should come in and give us data demonstrating why this is a problem, how it's a problem, and something other than philosophical or theoretical because the TSG was not comprised of business, economic, civil society, or other representatives that would certainly have a different view of the likelihood of any of the TSG problems.

Because I understand in theory. Yeah, if you want to put billions and billions and billions of labels in the root, that could be a problem. But is that really going to happen? No. So anyway, thanks.

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DONNA AUSTIN: Thanks, Jeff. Ariel, I think your hand was up.

ARIEL LIANG: Yes. I think, just quickly, two points. So the question in the charter about ceiling value, you can interpret that [loosely] or broadly. So it can be a specific number, how many variant labels can be delegated. But it can also be, should there be a limit in terms of delegating allocatable variants? So I just wanted to provide a quick comment there.

And then second, I think in the second part of the presentation that Sarmad was supposed to go through, there is already some language community proposing ceiling value. For example, the Chinese community. They're proposing only three variants before top-level. One is applied-for label. The other is the simplified version. The other is the traditional version. So there are some existing examples there, but I won't go into detail.

But just to quickly remind folks that there's another part of the presentation that Sarmad plans to go through. But we can address that in a future call.

DONNA AUSTIN: Thanks, Ariel. And I think I heard during ICANN73 that with the Japanese labels, they're recommending no variants. But maybe I misheard that. So maybe that's something else we need to take into consideration as to whether there are other work out there that we could consider as part of this conversation.

So I think what I'm hearing is that people want to see more data or more information that goes to the heart of this question about whether there should be some kind of ceiling value or other mechanism to ensure that the variant labels remain small. So we will see if we can …

I think Edmon suggested the [I/G] Panel group. Maybe we can get someone from a SSAC on the call or we'll draw on during Sarmad's expertise to address some of the specific items that people have raised here. And we'll try to get that for our next call, but I can't guarantee it.

So I think this has been a good discussion. I think we have some issues to resolve because I think Satish is saying we need to be conservative in our approach. Dennis is saying we need to be more data. Why would we regulate the numbers? So a bit more work to be done here, so we will see what we can pull together from a background perspective and come back to this next week if we can.

So Jeff, we are over time. So quickly.

JEFF NEUMAN: Yeah. Just if you read the last thing I put in the chat. We can change the focus and say that although there's no limit on the number of variant labels that are delegated to a particular registry, registries must ensure that—and we'd obviously work on the language—any variant labels that are delegated are manageable for registrars and its registrants.

So you focus the policy on the protection of the registrars and registrants, as opposed to an artificial limit on registries. I would like that approach, as opposed to the approach we've been taking. Thanks.

DONNA AUSTIN: Okay .Thanks, Jeff. And Joseph is suggesting we should discuss this with RSSAC. So look, we'll see if we can pull together some more data. And Ariel, I'm going to ask you if you can post this deck to the list because there is more information in this deck for people to review. And we'll see if we can pull together some of these people to present on our next call to answer some of these questions.

Thanks, everybody. Julie, I think we can call it.

JULIE BISLAND: All right. Thanks, everyone for joining. This meeting is adjourned. Have a good rest of your day.

[END OF TRANSCRIPTION]